

Cambridge Waste Water Treatment Plant Relocation Project Anglian Water Services Limited

Statement of Common Ground: South Cambridgeshire District Council

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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.
- 1.1.4 To date, SCDC has 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
 - i. Green Belt Policy
 - ii. Very Special Circumstances
 - iii. Landscape) [REP5-062]
 - iv. Historic Environment [REP5-036]
 - v. Carbon [REP5-032]
 - vi. Ecology and Biodiversity [REP5-062]
 - vii. Land Quality and Contamination [REP5-038]
 - viii. Odour Impacts [REP5-044]
 - ix. Air Quality Impacts [REP5-026]
 - x. Noise and Vibration [REP5-042]
 - xi. Public Health [REP5-034]
 - xii. Community Impact [REP4-028]
 - xiii. Public Rights of Way [AS-153]
 - xiv. Highways and Transportation [REP5-046]
 - xv. Climate Resilience [REP5-030]
- xvi. Other Matters
- Waterbeach New Station
- Site Selection Alternatives

1.3 Status of the SoCG

- **1.3.1** This version, Version 5 of the SoCG represents the position between the Applicant and SCDC as of 2 April 2024 (covering the pre-application and pre-examination stage of the process).
- **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 (TWG) 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	AW Comments	SCDC Comments	Status
which agreement is sought.			
List of relevant policies	See Planning Statement [REP1-049] Appendix 5 for a list of	SCDC agrees with the list within the Applicant's	Low
	the relevant Development Plan policies.	Planning Statement [REP 1-049]	
Local Plan Policy Compliance	See Planning Statement – Local Policies Accordance Table	The Local Polices accordance table [REP1-051]	Low
Table	[REP1-054].		
History of the North East	The development potential of this area including the	For over 20 years the existing CWWTP site and	Low
Cambridge area	existing WWTP site has been identified for over 20 years in	surrounding area has been promoted through	
	a series of development plans as part of the development	consecutive statutory planning policy documents for	
	strategy for the Cambridge area. It was first identified as a	redevelopment, to make the most of the Greater	
	reserve of land for future growth and redevelopment in the	Cambridge area's sustained economic growth and,	
	Cambridgeshire Structure Plan 1989.	more recently, the significant investment in	
		sustainable transport provision that serves the North	
	This is a brownfield site on the edge of Cambridge which	East Cambridge area.	
	has not been delivered due to financial viability issues. The		
	HIF funding that has been secured in 2019 overcomes this	As set out in the LIR (para 6.5), a document capturing	
	issue and the site is included in the emerging NECAAP and	the Chronology of the investigations into the feasibility	
	GCLP.	of redevelopment of the Cambridge Waste Water	
		Treatment Plant site (November 2021) [LIR Appendix	
	The lengthy history of the North East Cambridge area is set	1, GCSP-18] is a supporting document for the	
	out in the Applicant's response to ExQ1 2.10 [REP1-079]	emerging North East Cambridge Area Action Plan (see	
	and in Section 2 of the Applicant's Planning Statement	Emerging Development Plan Context section below). It	
	[REP1-049].	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 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.	
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. The adopted Cambridge Local Plan 2018 (Policy 15) and corresponding Policy SS/4 of the South Cambridgeshire Local Plan 2018 identify the existing Cambridge WWTP site and surrounding area for redevelopment for high quality mixed-use development primarily for employment use as well as a range of supporting uses, commercial, retail, leisure and residential uses. These policies also state that the amount of development,	are South Cambridgeshire Local Plan 2018, Policy SS/4 and Figure 6 and Cambridge Local Plan 2018, Policy 15 and Figure 3.3. These are mirror policies in each plan and each figure shows the whole of the Cambridge Northern Fringe area across both Councils' areas. The policies envisage the creation of a 'revitalised, employment focussed area centred on a new transport interchange'. They allocate the area for high quality mixed-use development, primarily for employment use as well as a range of supporting uses, commercial, retail, leisure and residential uses (subject to acceptable environmental conditions). They state	Low
	site capacity, viability, timescales and phasing of development will be established through the preparation of an AAP. The NECAAP has been prepared in response to these policies.	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.	
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	Low



	The Proposed Submission AAP has been agreed by the Councils for future public consultation. Policy 1 of the AAP makes provision for NEC to accommodate 8,350 new homes and 15,000 new jobs, of which 5,400 are to be provided on the existing WWTP site.	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.	
		An addendum to the Local Development Scheme (2022) was agreed by both Councils in March 2024 and published on the Greater Cambridge Shared Planning website (Local Development Scheme (greatercambridgeplanning.org)), which included an update on the position in respect of the NECAAP. It stated that the future of the NECAAP will be kept under review once timings and outcome of the WWTP DCO process are clearer, and taking into account the implications of, and options provided by, the new plan making system. This will be done in the context of seeking to provide a clear planning framework for this key strategic site as soon as possible (paragraph 17-	
Emerging Greater Cambridge Local Plan (GCLP)	See Planning Statement [REP1-049] paragraphs 2.3.21 to 2.3.36. Policy S/NEC allocates NEC for housing and employment development which will form an important part of the development strategy for the Local Plan. Evidence supporting the GCLP is clear that the NEC site is the most sustainable location for strategic scale development available within Greater Cambridge. The resolution by the Councils to approve the Development Strategy Update (Regulation 18 Preferred Options) report on 6 February 2023 provides a clear position on NEC as one of three key strategic sites which will form "central building plocks of any future strategy for development" in the next GCLP Draft Plan (Regulation 18) consultation.	a new residential-led City district. The area proposed to be allocated in the emerging Greater Cambridge	Low



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	1
January 2023 confirmed that NEC should form a	
central building block for any future strategy for	
development for Greater Cambridge and was	
confirmed by the Councils for inclusion within the	
emerging GCLP. See LIR paras 6.50-6.63 and 6.72-6.77.	
An addendum to the Local Development Scheme	
(2022) was agreed by both Councils in March 2024 and	
published on the Greater Cambridge Shared Planning	
website (Local Development Scheme	
(greatercambridgeplanning.org)), which included an	
update on the position in respect of the GCLP. It states	
that it has become clear is that it will not be possible	
to progress the GCLP under the current plan-making	
system if the cut-off date for the transitional	
arrangements remains as end of June 2025. Officers	
are therefore exploring with government the potential	
for being a "front runner" for the new planning	
process, including the potential merits and	
opportunities it could bring and in order to minimise	
any further delay to the emerging GCLP. These include	
the new system including a prescribed period for plan	
making and examination that has the potential to	
ensure a much more expedient process than the	
Councils experienced for the 2018 Local Plans. It seems	;
reasonable to assume that adoption of the GCLP under	
the new system would likely be similar to that if the	
Councils were able to progress under the current	
system, and potentially earlier. Until such time as we	
have clarity on the specific requirements of the new	
	-



		system it is difficult to set a specific detailed local plan timetable. However, it is not unreasonable to say that an indicative timetable for a local plan under the new system, on the basis of current understanding, is to achieve Gateway 1, the start of the formal 30-month process, by autumn/winter 2025. Once there is more clarity on the full range of current external uncertainties, including details of the new plan-making process and whether the Councils are accepted as front-runners, officers will be able to bring a more specific timetable for the full plan-making process to Members (see in particular paragraphs 22-23 and for context the Section Key Dependencies for Determining a future CCLP. Timetable paragraphs (20)	
Implications of Water Supply,	See Planning Statement [REP1-049] paragraph 2.3.30 to	a future GCLP Timetable paragraphs 6-20). The LIR advised as follows: There remains uncertainty	Low
including for Plan timetables	2.3.36.	over the ultimate level of development that can be	
	Water supply matters are also addressed in the Applicants	served with a sustainable water supply, it is	
	response to EXQ1 21.58 [REP1-079]	anticipated that there should be a conclusion to the	
		Water Resource Management Plan (WRMP) being	
	It is anticipated that, due to the timescales for the	prepared by Cambridge Water around the end of	
	relocation of the existing WWTP into the early 2030s, the	2023. If there is a further delay, it is considered that a	
	water supply situation will be resolved through measures	resolution is likely to be achieved by the end of the	
	being included within the Water Resource Management	DCO examination process. Whilst there are delays to	
	Plans (WRMPs) being prepared by Cambridge Water and	the emerging Local Plan process, it is not anticipated	
	Anglian Water. These include new water supplies via the	that the water supply situation would delay taking	
	Grafham Transfer and latterly the delivery of new	forward the Proposed Submission NECAAP following	
	reservoirs.	the conclusion of the DCO process. See LIR paras 6.64-	
		6.71.	
	In addition to this the Government announced on 6 March		
	2024 an update on government measures to address water		
	scarcity in Greater Cambridge. This includes reference to	the Written summary of Oral Submissions made at the	
	the new water supply infrastructure and nature based	Issue Specific Hearing 4 (ISH4) and responses to the	
	solutions and a water credits system.	Action Points Raised at Action Point 37. This sets out	
		the acknowledged challenges in available water supply	



	https://www.gov.uk/government/publications/addressing-		
	water-scarcity-in-greater-cambridge-update-on-	also sets out the range of measures being undertaken	
	government-measures/addressing-water-scarcity-in-	by Government to address this issue including through	
	greater-cambridge-update-on-government-measures	the Water Scarcity Group and commitment to £9	
		million funding.	
		Cambridge Water has published a further update of its	
		Water Resource Management Plan in February 2024 in	
		response to issues raised by the EA, with a view to it	
		being approved by DEFRA. It may still be the case that	
		it is approved before the close of the DCO	
		examination, but even if not, there has been	
		considerable progress since the LIR was submitted, as	
		set out above and in the response to AP37.	
		South Cambridgeshire District Council together with	
		the Cambridge City Council has a robust policy position	
		to address the issue of water efficiency going forward	
		albeit one that is still to be finalised. The South	
		Cambridgeshire District Council also remains confident	
		that the water supply situation would not delay taking	
		forward the Proposed Submission NECAAP following	
		the conclusion of the DCO process, as set out in	
		paragraph 6.71 of the LIR. In addition, the timing of	
		housing delivery at NEC as planned in the in the	
		housing trajectory in the emerging AAP to 2041 and	
		beyond, is able broadly to fit with the increase in water	
		supply and the removal of the odour constraint, as set	
		out in paragraph 6.84 of the LIR.	
Extent to which housing needs	See Planning Statement [REP1-049] Section 2.1 and the	If the DCO were not approved or if for any other	Low
could be met without the	Applicant's comments on SCDC's LIR [REP3-054].	reason the release of CWWTP does not occur, this	LOW
relocation of the CWWTP	Very little of the total housing proposed in the NECAAP	would mean that the long-sought regeneration of	
	for the NEC area could be delivered with the retention of	North East Cambridge would remain undeliverable,	
		-	
	the existing WWTP. Development of this area would	and the local plans would be further delayed. The	



		· · · · · ·	
	largely be restricted to employment and commercial	Councils would therefore necessarily have to go back	
	development. Few if any of the wider regeneration	through the process of considering the available broad	
	benefits for NEC would likely be realised, including	locations for development that performed next best	
	particularly the key NEC vision to create a new high	against the guiding principles. There would be a need	
	quality mixed-use city district co-locating employment	to identify and allocate other strategic scale site(s)	
	and residential development. In the absence of the	within Greater Cambridge to meet the area's need for	
	quantity of new housing envisaged in the NECAAP, less	housing and employment, so far as is possible within	
	sustainable locations would need to be identified by the	infrastructure constraints, including water supply and	
	Councils to deliver their spatial development strategy for	housing deliverability considerations. on the basis of	
	homes and jobs as set out in the emerging GCLP.	the evidence available to the District Council at this	
	The delivery of a new low-carbon city district making a	time, the alternative locations to North East	
	key contribution to the development of Cambridge,	Cambridge that could be available to meet the	
	supporting growth in the economy and making an	Councils development needs are all less sustainable in	
	important contribution to meeting government housing	transport terms and the carbon emissions arising. it is	
	objectives (the regional and national significance of	not the Councils' position that active alternatives to	
	which has been recognised in the SoS's s.35 direction of	the North East Cambridge scheme have been or are	
	18 January 2021 and its importance elevated by the	being identified. See LIR paras 6.78-6.82.	
	announcement by the Prime Minister and the Secretary		
	of State for Levelling Up, Housing and Communities on 24		
	July 2023 to 'supercharge' Cambridge) would be lost. This		
	is a matter which the applicant believes is a 'both		
	important and relevant' matter (in s104(2)(d) and		
	s105(2)(c) PA2008 terms) which should be given		
	substantial weight in the determination of the DCO		
	application.		
Progressing the emerging Deve	lopment Plans		
Housing Trajectory on the	The draft NEECAAP makes provision for the NEC to	The housing trajectory in the Proposed Submission	Low
CWWTP site in the emerging	accommodate 8,350 new homes, 15,000 new jobs, and	draft of the NECAAP indicates 1,900 homes coming	
NECAAP and Local Plan	the provision of various community, cultural, and open	forward on the Applicant and City Council owned land	
	space facilities in NEC. Of the 8,350 new homes,	over the plan period 2020 – 2041, out of a total of	
	approximately 5,400 are expected to be delivered on the	5,500 homes on that land. All these homes are on land	
	existing CWWTP site.	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.	
		1 · · · · · · · · · · · · · · · · · · ·	



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 been approved and would be submitted for Examination if the DCO is approved. A Development Strategy update was approved by both Cambridge City and South Cambridgeshire Councils in February 2023 which confirmed NEC as one of three key strategic sites in the emerging Local Plan. It is for the independent examination process to debate any site-specific concerns and suggest such changes as may be required to ensure that the final NECAAP is sound and can be formally adopted.	The Proposed Submission NECAAP has already been approved by both authorities and would be advanced, following a further health check, to publication and submission for examination if the WWTP DCO is approved. Objections to the principle of development will largely fall away if the DCO is approved. The independent examination process is the appropriate forum through which to debate any site-specific concerns, and the Councils will be directed by the appointed Planning Inspector to make such changes as may be required to make the final NECAAP sound and capable of formal adoption. See LIR paras 6.90- 6.94. See also Proposed Submission North East Cambridge Area Action Plan (NECAAP) section above in respect of the latest update on timetable.	Low
Degree of certainty for	See Planning Statement [REP1-049] paragraph 2.3.12 to	The Applicant and the City Council have appointed a	Low
redevelopment of existing	2.3.36. There is a high degree of certainty that the	master-developer to bring forward a planning	LOW
CWWTP site	existing WWTP site is suitable for housing development.	application for redevelopment of the existing CWWTP	
	Its future use for housing is secured through the Homes	site. The Greater Cambridge Shared Planning Service	
	England HIF agreement. The 'NECAAP - Chronology of the	has recently commenced preapplication discussions	
	feasibility investigations of redevelopment of the	with the master-developer team and a Planning	
	Cambridge Waste Water Treatment Plant' Report (July	Performance Agreement has been entered into.	
	2021) lists studies dating back to 1989 into feasibility of	Members of both Councils have continued to reiterate	
	the redevelopment of the existing site. Studies in support	-	
	of the Reg.19 version of the NECAAP have specifically	area. See LIR paras 6.95-6.97.	
	looked at the suitability of the vacated site for housing		
	development and have not raised any issue which would		
	suggest the site is not suitable. In terms of potential contamination, LandsecU+I / TOWN as master developers		
	have commissioned a Preliminary Risk Assessment of the		
	WWTP site which considers that it is unlikely that the site		
	would be classified as Contaminated Land under Part 2A		
	of the Environmental Protection Act (EPA) 1990.		



	Contamination risk is therefore considered to be		
	manageable, both technically and commercially.		
Vhat could be achieved in	If the CWWTP were to remain in its existing location, the	Consolidation of the Cambridge Water Recycling	Low
North East Cambridge if the	full NEC development would not be delivered and	Centre within Cambridge to provide a new treatment	
WWTP remains in situ	therefore, fewer homes and jobs would be created.	plant facility on the current site was considered as part	
		of the business case supporting the HIF bid, which	
	See Planning Statement [REP1-049] paragraph 2.3.20, the	concluded that without the potential for housing, any	
	Applicant's response to ExQ1 2.34 [REP1-079] and the	redevelopment would not attract HIF type funding,	
	Applicant's comments on SCDC's LIR [REP3-054]. The	and this would render a consolidation option unviable.	
	Applicant's position is that no more than 325 homes can	Only three land parcels providing for residential	
	be achieved if the CWWTP remains in situ. The Applicant	development in the NECAAP lie outside the odour	
	does not agree with the Council's assessment that a	contours using Figure 1 from the 2020 updated Odour	
	maximum of 1,425 homes could be delivered. However,	impact assessment as the worst-case scenario for what	
	even at 1,425 dwellings, this would represent no	could take place with the CWWTP remaining in situ,	
	more than 17% of the total housing proposed in the	totalling 1,425 dwellings. However, in the absence of	
	NECAAP for the NEC area which could otherwise be	the regeneration of the wider NEC area and the	
	delivered if the Proposed Development is granted	provision of a higher quality environment, it is	
	consent. Development around the existing WWTP would	uncertain whether the landowners would continue to	
	largely be restricted to employment and commercial use	support residential development in favour of other	
	(as recognised by the Council at paragraph 6.99 of their	more suitable uses such as office and lab space. See	
	revised LIR). This development would likely be of a lower	LIR paras 6.34-6.35 and 6.98-6.101.	
	quality and density than proposed through the NECAAP,		
	recognizing the surrounding context and the need to		
	achieve a suitable level of amenity in the vicinity of		
	ongoing waste water treatment plant operations. Few if		
	any of the wider regeneration benefits would likely be		
	realised, including particularly the key NEC vision		
	to create a new high quality mixed-use city district co-		
	locating employment and residential development. In the		
	absence of the quantity of new housing envisaged in the		
	NECAAP, the Applicant considers that NEC would		
	continue to be a commuter destination constrained by		
	the recognised traffic capacity issues around junction 33		
	A14/Milton Road and with the need for the Council to		



	identify alternative less sustainable sites to accommodate the homes which could not otherwise be delivered within NEC.		
Relationship between the ReWWTP DCO and the	The progression of both the North East Cambridge Area Action Plan (NECAAP) and Greater Cambridge Local Plan	The Council considers there is an interdependence between this DCO application process and the	Low
emerging development plans	(GCLP) are dependent on the WWTP being approved for relocation.	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	
	See Planning Statement [REP1-049] paragraphs 2.3.12 to 2.3.36.	(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	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.	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	Low
emerging Local Plan and AAP examinations when attributing weight to those documents	See Planning Statement [REP1-049] paragraphs 2.3.12 to 2.3.36_and the Applicant's response to ExQ1 2.11 [REP1-079]. Substantial weight should be afforded to 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	
	NECAAP given the significant change in circumstances of the HIF award since the Local Plans for Cambridge City and South Cambridgeshire were adopted in 2018 and	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	



	particularly to the extent of the development potential of the area identified in it. The NECAAP is being prepared in accordance with the requirement set out in Policy 15 of the adopted Cambridge City Local Plan 2018. It makes provision (Policy 1) for NEC to accommodate 8,350 new homes (3,900 in the period to 2041) and 15,000 new jobs, predicated on the relocation of the existing WWTP. Weight should also be given to the GCLP - First Proposals	development" as required of the preparation of an Area Action Plan for the site within the extant Local Plan policies. In this context, the AAP is less about the principle of redevelopment and more about consideration of the amount and type of development that could be realised should relocation of the CWWTP take place. Such considerations are informed by	
	(Regulation 18: Preferred Options), particularly to the supporting evidence that the NEC site is the most sustainable location for strategic scale development available within Greater Cambridge, and given the resolution by the Councils to approve the Development Strategy Update (Regulation 18 Preferred Options) report on 6 February 2023 which provides a clear position on NEC as one of three key strategic sites which will form "central building blocks of any future strategy for development" in the next GCLP Draft Plan (Regulation18) consultation. This identification of the NEC does not therefore prejudice the outcome of the emerging local plans.	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 Cambridge to the Cambridge Economy	NEC is a key strategic site in the Greater Cambridge area. It is a highly sustainable location and the relocation of the WWTP will provide the opportunity for 8,350 homes to be delivered alongside the creation of 15,000 new jobs, and provision of various community, cultural, and open space facilities in NEC. No other brownfield site offers the transport connections and access to the countryside. Within 1km of the WWTW there is presently just under 268,000 sqm of employment space in world-leading centres of excellence including Cambridge Science Park and more general employment space. There is 35,000 sqm of floorspace consented and yet to be built. The NECAAP proposes to deliver up to another 188,000 sqm	The provision of 8,350 net additional homes would make a substantial contribution towards meeting Greater Cambridge's housing needs to 2041 and well beyond and would support the continue economic growth of the area and Greater Cambridge. The location of the existing CWWTP and surrounding area is in a key strategic location adjacent to Cambridge Science Park, a leading location for the technology sector, one of the key sectors in the nationally significant Cambridge economy. See LIR paras 6.111- 6.112.	Low



	in allocated employment space. No other location is able to offer anywhere near that level of existing and proposed employment space. The opportunity presented in NEC is specifically referenced in recent written ministerial statements. See Planning Statement [REP1-049] Sections 1.1, 2.1 and 2.2, paragraph 10.4 REP4-088 and the Applicant's response to ExQ2-1.4 [REP5-111].		
Government's Cambridge 2040 initiative	The announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 includes proposals to 'supercharge' Cambridge as Europe's science capital through the delivery of a new quarter of well-designed, sustainable and beautiful neighbourhoods for people to live in, work and study with government delivery of infrastructure and affordable housing using land value capture all driven forward by a 'Cambridge Delivery Group' chaired by Peter Freeman (Chairman of Homes England) and backed by government funding. The remit of this Group includes taking definitive action 'to accelerate the relocation of water treatment works in Northeast Cambridge (subject to planning permission)' . The subsequent ministerial statement made on 19 December 2023 and the Chancellor's Budget announcement on 6 March 2024 include further specific reference to this initiative through the confirmation of a long-term funding settlement for a Cambridge development corporation supported by the release of 'The Case for Cambridge' which makes specific reference to the desire to secure early delivery of NEC. See Planning Statement [REP1-049] Sections 1.1, 2.1 and 2.2, paragraph 10.4 REP4-088 and the Applicant's response to ExQ2-1.4 [REP5-111].	Government's Cambridge 2040 initiative recognises the significance of the Cambridge economy and in respect of NEC is seeking to accelerate the relocation of the WWRP (subject to planning permission), and unlock an entire new City quarter. See LIR paras 6.113- 6.115. Since the original Cambridge 2040 ministerial statement in July 2023, further statements have been published in December 2023 and alongside the Spring Budget Statement 2024. These continue to emphasise Government's ambitions for the Cambridge area and the most recent 'Case for Cambridge' also specifically referenced North East Cambridge Delivery Group is actively supporting the area to unlock and accelerate planned growth (see Council's response to ExA's Third Written Questions, number 1.5).	Low



Benefits arising from vacation	A number of benefits will be enabled.	There is clear evidence through the emerging plan	Low
of the existing WWTP site	See Section 4.2 and Table 4.3 below, and Planning	making processes in respect of the NECAAP and GCLP	
	Statement [REP1-049] Sections 2.1 and 2.2.	of the significant planning benefits that would be	
		enabled by the relocation of the CWWTP site. See LIR	
		paras 6.1, 6.29 – 6.33, 6.52 – 6.63 and 6.116.	

4.2 Benefits of the DCO Application and Project

Statement/document on which	AW Comments	SCDC Comment	Status
agreement is sought.			
Planning	Decommissioning and release of the existing WWTP site will enable	The Council recognises there are substantial	Low
Benefits	regeneration and the creation of a new district delivering 8,350	planning benefits that would arise as a	
	homes (40% affordable), 15,000 new jobs and a wide range of	consequence of the development proposal,	
	community, cultural and open space facilities (including a	benefits that have been identified for over	
	community garden and food growing spaces, indoor and outdoor	20 years in Regional, Structure and Local	
	sports facilities) on a brownfield site within the urban area of	Plans, but that have not been able to be	
	Cambridge.	delivered due to viability constraints. The	
		HIF funding provides a once in a generation	
	Specifically, relocation will create the opportunity for a 42 hectares	opportunity to address the viability issue	
	brownfield site for redevelopment and release a further 35	that has prevented regeneration for	
	hectares of land currently constrained to general industrial and	decades. There is very little potential for	
	office use on an area of land forming the gateway between	regeneration of the CWWTP site and	
	Cambridge North station and the Cambridge Science Park which is	surrounding area of North East Cambridge	
	identified in the Regulation 19 version of the North East Cambridge	Area without the relocation of the CWWTP.	
	Area Action Plan (NECAAP) as having the potential to provide: On	The District Council considers the planning	
	the existing WWTP site -	benefits that would arise to be as set out in	
	• 5,500 new homes	its LIR and as summarised at paras 6.116-	
	 23,500 m2 new business space 	6.119 but include the following:	
	• 13,600 m2 new shops local services, community, indoor sports	The release of the existing CWWTP site will	
	and cultural facilities	underpin the delivery of 8,350 homes. This	
	• 2 primary schools and early years centres and land safeguarded	is demonstrated by the evidence in support	
	for 1 additional primary school if needed (and space set aside for a	of the Draft Proposed Submission NECAAP	
	secondary school if needed)	(Regulation 19) which shows the potential	



	 On the surrounding area - 2,850 new homes 105,000 m2 new business space 5,000 m2 re-provided business floorspace 23,200 m2 re-provided industrial, storage and distribution space (B2 and B8) Partial retention of existing commercial floorspace 	a further c.2,850 net new homes on surrounding sites. Enabling the NEC area to come forward will make a significant contribution to the substantial objectively assessed housing need in accordance with the NPPF of the Greater Cambridge area identified in the emerging Greater Cambridge Local Plan to 2040 and beyond	
Environmental Benefits	 Environmental benefits through the delivery of a new modern, low carbon waste water treatment facility: significantly reducing carbon emissions (from being operationally net zero and energy neutral) improving storm resilience (by making storm overflows and CSOs less likely to occur) improving the quality of recycled water returned to the River Cam (by reducing concentration in final treated effluent discharges of phosphorus, ammonia, total suspended solids and BOD) maximising public value and supporting the circular economy (by more efficiently and effectively recycling and re-using waste water in the interests of public health) restoring and enhancing the surrounding environment (by increasing biodiversity by a minimum 20% complementing local initiatives such as the Cambridge Nature Network and Wicken Fen Vision) substantially reducing the number of homes and properties which may potentially experience odour¹ (when compared to the equivalent area for the Proposed Development) 	 South Cambridgeshire District Council recognises the significant environmental benefits arising as a result of the proposed development including: The release of the existing CWWTP site for redevelopment will remove the existing constraints imposed by the Waste Water Treatment Safeguarding Area designation upon the site and surrounds in respect of any development on land within the odour contours around the existing CWWTP, which incorporates a substantial area of previously developed land. This in turn enables the future development of the wider NEC area, including the existing CWWTP site, which is identified through the evidence supporting the emerging joint Greater Cambridge Local Plan (Regulation 18) as 	



	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.	 the most sustainable location in Greater Cambridge for development. The delivery of the CWWTP infrastructure would deliver treatment to a higher standard with lower energy use and carbon emissions than the existing plant. Increased on-site storage of foul/untreated water during storm flows would contribute positively to the improved resilience of the Water environment and rivers downstream to the foul water discharge point. 	
Social Benefits	 Social benefits through: improving access to the countryside (by the delivery of new paths and accessible open spaces) enhancing education (through the facilities provided in the Discovery Centre and increased access to the WWTP) enhancing recreational opportunities (formalising recreational access and providing wider connectivity through new and enhanced public rights of way) The provision towards new recreational space and enhanced public rights of way, while necessary to mitigate the impact of the development, would also be available to everyone in the local area. These are social benefits of the scheme which we consider should carry moderate weight. 	 The District Council recognises the social benefits arising as a result of the proposed development including: Educational opportunities for schools and community groups provided in the Discovery Centre Enhanced connectivity through formalising recreational access for walking, cycling and equestrian users 	Low
Economic Benefits	 Economic benefits through: investment in construction and related employment for its duration increasing operational employment supporting planned population growth and urbanisation in Waterbeach (in water treatment terms) increasing operational resilience and flexibility to accommodate population growth projections plus an allowance for climate change into the 2080s in accordance 	The NEC site also offers the opportunity to deliver further beneficial commercial floorspace and a range of town centre uses, as well as social and physical infrastructure that will support the area's continued growth as a strategically important economic driver for Greater Cambridge and create a vibrant new urban quarter to Cambridge.	Low



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.	

4.3 Green Belt

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

Statement/document on	AW Comments	SCDC Comments	Status
which agreement is sought.			
Planning Statement: Green	The Green Belt policy situation is set out in the Planning	SCDC's position in respect of Green Belt is set out in the	Low
Belt Assessment (App Doc	Statement (App Doc Ref 7.5). The policy requirement on	LIR	
Ref 7.5.3).	Green Belt is as set out at Section 4.8 of the National Policy	As confirmed in the LIR which assesses the DCO against	
	Statement for Wastewater March 2012 (NPSWW), chapter	the NPPF Green Belt policy the proposal represents	
	13 of the National Planning Policy Framework (NPPF) and	inappropriate development in the Green Belt therefore	
	Policies 4 and S/4 respectively of the adopted Cambridge	to that degree the proposal conflicts with policy and	
	and South Cambridgeshire Local Plans 2018.	triggers the need for the Applicant to demonstrate very	
		special circumstances sufficient to outweigh the harm to	
	Section 4 of the Planning Statement (Application document	the Green Belt by way of inappropriateness and any	
	reference 7.5) assesses the Proposed Development against	other harm (see SCDC LIR updated[REP 5-120].	
	the policies set out in the NPSWW. In the context of the		
	NPSWW policies relating to 'Land Use', and noting that a	SCDC addresses the issue of very special circumstances	
	significant proportion of the project falls within Green Belt	from the benefits of the proposed development at	
	(as defined in the South Cambridgeshire Local Plan 2018),	length within the LIR [REP 5-120]. The determination of	
	paragraphs 4.8.26 – 4.8.45 address the consistency of the	whether these benefits constitute very special	
	Proposed Development to Green Belt policy which	circumstances which are sufficient to outweigh the harm	
	fundamentally aims to prevent urban sprawl by keeping	assessed are matters for the ExA.	
	land permanently open. Paragraph 4.8.18 of the NPSWW		
	(which mirrors paragraph 137 of the NPPF) directs the		

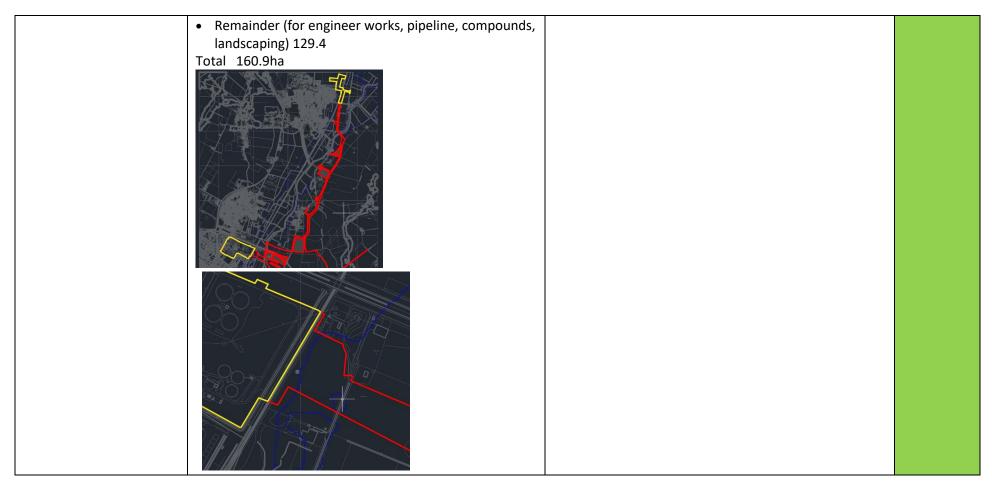


	decision maker to resist inappropriate development in the		
	Green Belt except in very special circumstances. Very		
	special circumstances will not exist unless the potential		
	harm to the Green Belt by reason of inappropriateness, and	1	
	any other harm resulting from the proposal, is clearly		
	outweighed by other considerations.		
Compliance with National	The Green Belt purposes as set out in the NPPF are:	SCDC's position in respect of policy compliance is set out	Low
and Local Policy	a. to check the unrestricted sprawl of large built-up	in our LIR	
	areas;		
	b. to prevent neighbouring towns merging into one	South Cambridgeshire Local Plan Policy NH/8: Mitigating	
	another;	the Impact of Development In and Adjoining the Green	
	c. to assist in safeguarding the countryside from	Belt relates to development that is both appropriate or	
	encroachment;	inappropriate. When considering inappropriate	
	d. to preserve the setting and special character of historic		
	towns; and	adopted is that required under the NPPF and as reflected	
	e. to assist in urban regeneration, by encouraging the	in South Cambridgeshire Local Plan Policy S4 (see below).	
	recycling of derelict and other urban land	SCDC considers that this policy is relevant to the exercise	
		of the assessment of harm arising which would then be	
	Paragraph 2.30 of the adopted South Cambridgeshire Local	-	
	Plan sets out the particular purposes of the Cambridge	and whether they are sufficient to outweigh the harm to	
	Green Belt:	the Green Belt harm.	
	Preserve the unique character of Cambridge as a		
	compact, dynamic city with a thriving historic centre;	South Cambridgeshire Local Plan Policy S/4: Cambridge	
	 Maintain and enhance the quality of its setting; and 	Green Belt is relevant to this proposal. Policy S/4 sets out	
	 Prevent communities in the environs of Cambridge 	that a Green Belt will be maintained around Cambridge	
	from merging into one another and with the city.	defining the extent of the urban area as shown on the	
	Policies 4 and S/4 respectively of the adopted Cambridge	Policies Map. It confirms that new development in the	
	and South Cambridgeshire Local Plans do not allow	Green Belt will only be approved in accordance with	
	inappropriate development unless very special	Green Belt policy in the National Planning Policy	
	circumstances can be demonstrated. However, they do	Framework.	
	allow for appropriate development including engineering		
	operations.	Para 7 10 of the SCDC LIP [PEPE 120] that "The proposal	
		Para 7.19 of the SCDC LIR [REP5-120] that "The proposal	
		would have an adverse effect on the rural character and	
		openness of the Green Belt"	

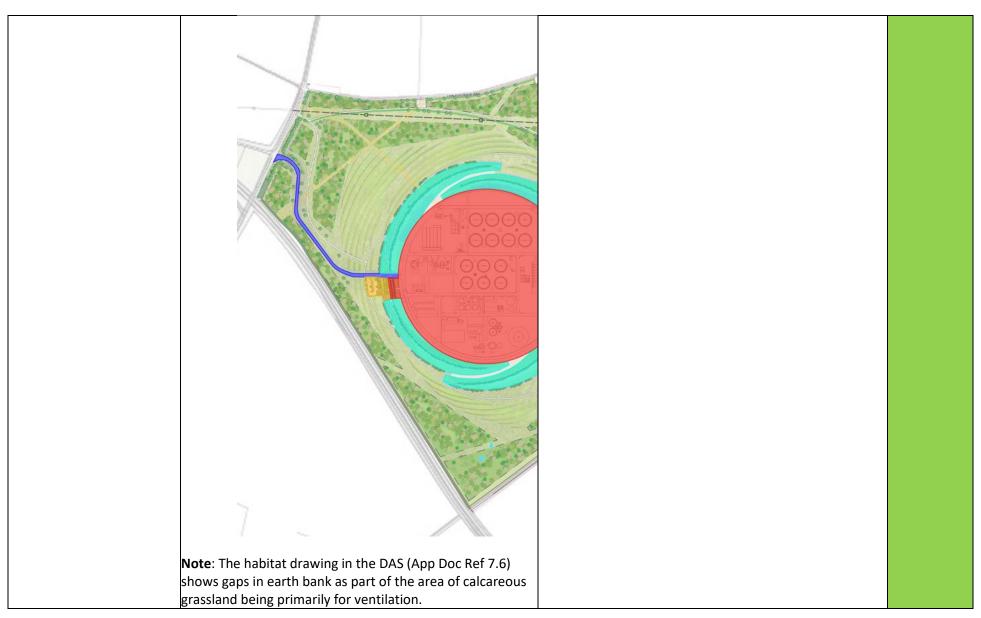


	1	
In accordance paragraphs 149 and 150 of the NPPF, the		
proposed woodland, hedgerows, tree planting, meadows	To that degree the proposal conflicts with NH/8 however	
and recreational routes shown on the landscape	it is for the ExA to make the final determination which	
masterplan (within the LERMP Application Document	weighs harm against any finding that very special	
Reference 5.4.8.14) do not comprise development and are	circumstances exist.	
not be considered to be inappropriate development. In		
addition, the following works are not considered to be	As noted below SCDC does consider that there are	
inappropriate development within the Green Belt:	significant benefits as detailed in the SCDC LIR [REP 5-120]	
The pipeline and connection infrastructure	that <u>could</u> amount to very special circumstances.	
The discharging point substantially underground		
 Access road (and small surface level car park) 	If the determination is made that there are very special	
	circumstances, then SCDC consider that Policy NH/8 could	
The proposed WWTP and surrounding earth bank (as a	be treated as complied with subject to the mitigation as	
substantial structure in its own right) do not fall within the	set out by the Applicant.	
exceptions set out at NPPF paragraphs 149 and 150 and		
must, accordingly, be considered to be inappropriate	SCDC would reiterate the point that if this proposal was	
development.	an application under the TCPA 1990 it would be for the	
The total area of land contained within the Draft Order	County Council to make this assessment and decision.	
Limits is 209 hectares. The land at Milton west of the	······································	
railway line and at Waterbeach north of Bannold Road		
totaling 48.1 hectares is outside the Green Belt boundary.		
The remaining 160.9 hectares is within the Cambridge		
Green Belt. The Proposed Development within this area is		
broken down as follows:		
Area of development inside the bund including the		
discovery centre (orange): 20.6ha		
 Area of the earth bank (green):10.0ha 		
 Area of the car park and circulation area 		
(yellow):0.4ha		
 Area of the access road (blue): 0.5ha 		
 Area of Sewer Outfall (App Doc Ref 4.13.4 and 4.13.5): 		
0.0ha		











- 4.3.1 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.
- 4.3.2 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	 Temporary and permanent landscape harm to the Eastern Fen Edge Chalklands LCA (4.7.17 and 4.7.20-4.7.21) and to a lesser degree to the River Cam Corridor LCA and Waterbeach-Lode Fen LCA diminishing over time Temporary and permanent harm to the visual amenity of local residents, users of local roads and users of public rights of way and other recreational routes (4.7.18 and 4.7.22 – 4.7.24) 	Moderate	Weighting is not for SCDC as an interested party but for the ExA.
Land Use	 Harm to farm businesses (4.8.8) Loss of BMV agricultural land (4.8.8) 	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)	-	Substantial	Weighting is not for SCDC as an interested party but for the ExA.
Designated Heritage Assets	 Indirect harm to the setting of Biggin Abbey (Grade II* listed)(4.10.13-4.10.14) Indirect harm to Baits Bite Lock Conservation Area and Poplar Hall (4.10.20) 	Less than Substantial	Weighting is not for SCDC as an interested party but for the ExA.



	•	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.

4.3.2 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 for 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.	Substantial	Weighting is not for SCDC as an interested party but for the ExA.
	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		



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). 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.	Substantial	Weighting is not for SCDC as an interested party but for the ExA.
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) [REP2-019]
- 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 AW C agreement is sought.	Comments	SCDC Comments	Status
Assessment ApproachAgreeThe assessment presented in ESChapter 8 Biodiversity App Doc Ref5.2.8 [REP2-007] including the datagathering methodology, baseline,scope of the assessment and theassessment methodology set out isappropriate.	.d.	SCDC is satisfied with the biodiversity methodology as set out in the Biodiversity Chapter of the ES [REP2 -007]	Low



Biodiversity Net Gain (BNG) The BNG report at App Doc Ref 5.4.8.13 [REP4-054] and the outcome of the calculations for the measures habitat, hedgerow and river is appropriate.	Agreed	SCDC is satisfied with the biodiversity net gain assessment as set out in the ES Volume 4 Chapter 8 Appendix 8.13 BNG Assessment Report [REP2-020]	Low
River Units	The Applicant has updated ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13 [REP4-054] and submitted at Deadline 4 to reflect the inclusion of Requirement 25 within the dDCO (App Doc Ref 2.1) [REP5-003]. 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.	A legal agreement will be required where the land used to provide the BNG offset is outside the order limits of the DCO through either (a) S106 will be between the Landowner and the local planning authority (likely to be Cambridgeshire County Council), or (b) Conservation Covenant with a responsible body. It is now agreed that this is appropriate to secure the delivery of the River Units	Low
Protected Species	It agreed that <u>Paragraph 7.2.26 replaced with</u> All mitigation bat boxes installed in line with th monitored and managed as per agreed licence licence (5.4.8.20 ES Volume 4 Appendix 8.20 B Statement) this mitigative provision is conside by proposals (impacts relate to disturbance or the roost impacted, with annual monitoring for	he approved Natural England licence will be conditions. Currently (as detailed within the draft at Natural England Ghost Licence Method red to be a bat box installed for each roost impacted ily), to be appropriately installed within proximity to r five years through visual inspection. It to be produced, alongside the approved Natural itigation and compensation provision (and the	Low



	Additional enhancement roosting provision will be provided on newly planted trees once mature, or within Low Fen Drove Way Grasslands and Hedges County Wildlife Site. Early planting of larger specimen trees and hedgerow plants will support linkages to facilitate retained commuting and foraging corridors.	
Habitat Management and Monitoring Plan	The following wording is now agreed Temporary habitat loss will occur during construction (for example because of land temporarily required for haul routes, access roads, compounds, spoil heaps, shafts as well as open cut areas for pipeline installation). These habitats will be reinstated post works to match those of habitats currently present (unless agreed otherwise with the landowner). Pre construction surveys shall include confirmation of habitat type (UKHab criteria) and checks for plant species identified in Table 3-1 of Appendix 8.10 (App Doc Ref 5.4.8.10) [APP-095] or other species identified as notable. Where these are identified, measures should be taken to avoid these such as refinement of working areas or local amendment of access tracks. Where avoidance is not possible the plants and or soils containing the plants should be either locally translocated or where practicable replanted. The translocated area should be protected during construction (i.e. fencing to prevent access). As required by the SMP disturbed areas will be returned to existing use once excavation/earthworks have ceased.	Medium
	Reinstatement planting to reestablish habitats will be undertaken in the first available planting season following construction. Species mixes will match the existing habitat. Any reinstatement of habitats carried out as part of the Proposed Development will be monitored annually for five years from completion of the construction phase by a suitably qualified ecologist. Any which fails to establish or becomes seriously damaged or diseased within five years after completion of construction will be replaced in the first available planting season with stock of the same species and size as that originally planted unless otherwise agreed with the Local Planning Authority and as agreed with the landowner. Habitat reinstatement will be set out in the Habitat Management and Monitoring Plan which will be submitted to and approved by the relevant planning authority prior to the commencement of the construction phase. The habitat reinstatement section of the Habitat reinstatement and Monitoring Plan will include a method statement for the habitat reinstatement works, habitat	



	reinstatement monitoring programme and scope of the habitat reinstatement monitoring programme (i.e. surveying UK Habitat condition, timeframe for each habitat meeting target condition).	
Invasive Non Native Species	The Applicant and SCDC have agreed the following wording will be included to the Outfall Management Plan [REP4-060] Section 5 For invasive non-native species, a pre-construction survey to check for the presence of invasive species will be undertaken and in the event, any are identified that controls are put in place. Biosecurity measures are also a requirement of construction method statements. Pre-construction checks must be undertaken at an appropriate time of year, and in good time to identify any species as listed under Schedule 9 of the Countryside and Wildlife Act 1981 (as amended) or schedule 2 of the Invasive Alien Species (Enforcement and Permitting) Order 2019. Eradication from or control on site may take months or years; therefore, checks must be begin a suitable time prior to the planned start of works to avoid unnecessary delays to works. Code of Construction Practice Part B Page 9 Before any plant material is transferred, or any works to riverbanks and riverbank tops is undertaken, the site must be evaluated by a suitably qualified ecologist for the presence of any species listed under Schedule 9 of the Countryside and Wildlife Act 1981 (as amended) or schedule 2 of the Invasive Alien Species (Enforcement and Permitting) Order 2019. If found, suitable precautions must be put in place to prevent the spread of such species beyond their current range prior to any works commencing. This could include treating with suitable herbicide for up to three years, removal of contaminated soil, construction of water damns to prevent contaminated soil and plant material floating down stream, and any other reasonable methodology required. It is an offence to deliberately or inadvertently increase the range of any species listed under Schedule 9 of t	Medium
	the 'tool box talks' to enable them to identify invasive species including floating pennywort and	



Himalayan balsam, and they will be required to immediately report any new areas of invasive	
species found during the construction period to the Environmental Manager;"	

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) [REP5-030].
- 4.5.2 The Assessment of the parameters of the climate assessment is presented from a sustainable construction point of view.

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
The assessment presented in Environmental Statement	Agreed	The District Council has assessed the possible	Low
Climate Resilience Chapter [Doc. Ref. 5.2.9] [REP5-030]		impacts identified in the Climate Resilience	
identifies the parameters of the climate assessment from a		Chapter of the ES [Doc. Ref. 5.2.9] [REP5-030]	
sustainable construction point of view in accordance with		from a sustainable construction view (rather than	
the use of the Institute of Environmental Management and		a flooding or drainage), and therefore the District	
Assessment (IEMA EIA Guide to Climate Change Resilience		Council's comments focus on the receptor	
and adaptation 2020 and IEMA methodology for in		identified as physical infrastructure.	
combination climate impacts (ICCC).			
Mitigation Measures	Agreed	The District Council notes that weather resilience	Low
The mitigation proposed within App Doc Ref 5.2.9 [REP5-030]		measures for the construction phase have been	
at para 2.8 are agreed.		outlined in Chapter 9 of the ES (Doc. Ref. 5.2.9)	
		[REP5-030] 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	Detailed Construction	The District Council notes that weather resilience	Low
and the monitoring of impacts and management of impacts	Environment Management	measures for the construction phase have been	
during the operational phase. These management plans	Plans (CEMP) to be prepared to	outlined in Chapter 9 of the ES Doc. Ref. 5.2.9)	
should be secured either by way of a requirement or within	align with the requirements of	[REP5-030] and it is important that these follow	
a section 106 Agreement.	the Code of Construction	through into a Construction Environmental	

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



	Practice (CoCP) Part A (App Doc Ref 5.4.2.1) [REP5-050] secured under Requirement 9	Management Plan (CEMP) as the proposed development progresses	
Other requirements	The Applicant has submitted a Design Code at Deadline 4 to demonstrate specifically for the attainment of BREEAM excellent The Design Code (App Doc Ref 7.17). [REP 4-085]	It is agreed that the Design Code will be updated throughout to remove the word "should" to "will" in the delivery of the BEEAM excellent rating for the Gateway Building secured through the Design Code [REP4-085] and dDCO [REP4- 003]. This update will be made at Deadline 6.	Low

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) [REP5-032].
- 4.6.3 An Outline is provided at Carbon Management Plan 5.4.10.2 [REP4-064]
- 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) [REP5-085].

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) [REP5-032] 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 [REP5-032],	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



and the baseline options for assessing the carbon emissions are appropriate.			
The scope of the assessment 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.		SCDC defer to the CoCC as discharging authority or the final agreement on the whole life carbon assessment.	Low
MitigationThe securing of adequate mitigation measures to ensure future carbon reductions through later design stages and onsite construction activities is sought.APP DOC Ref 5.2.10 [REP5-032 and REP5-033] App DOC Ref 7.5.2 (REP3-042 and REP3-043) Outline Management Plan Appendix to Chapter 10 App DOC Ref. 5.4.10.2 [REP4-064 and REP4-065]	Review in conjunction with Carbon Management Plan App Doc Ref 5.4.10.2 [REP4-064] and Requirement 21 of the dDCO.	The District Council has reviewed the updated Carbon Chapter of the ES as well as Strategic Carbon Assessment and now considers them acceptable.	Low

4.7 Community

- 4.7.1 The Community Chapter of the Environmental Statement Chapter 11 (App doc Ref 5.2.11) [REP4-028] 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) [AS-046] and Environmental Statement Volume 4 Chapter 11 Appendix 11.1 Community Questionnaire (App Doc Ref 5.4.11.1) [APP-110].
- 4.7.3 The Outline Community Liaison Plan (CLP) is provided at (App Doc Ref 7.8) [REP4-078] 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	AW Comments	SCDC Comments	Status
sought.			
The assessment presented in the Environmental Statement Chapter 11 Community (App Doc Ref 5.2.11) [REP4-028] 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) [REP4-078] 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 the new circular route proposed to include equestrian access across the non-motorised user section of the Horningsea bridge.	It is not agreed that it is appropriate to include any further equestrian access within the proposed new Public Rights of way than is currently presented as the new bridleway between Low Fen Drove Way (byway 14) and Station Road as shown coloured purple on sheet 6 f the rights of way plans (App Doc Ref 4.6.6) [REP1-018]. The inclusion of Equestrian access across the existing Horningsea bridge is not considered appropriate for safety reasons. 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	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. The District Council supports the amended highway design proposals for the bridge parapet to facilitate equestrian users.	Low



	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 5.3.8.14) [REP5-062] 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) [REP5-062] 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 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.	The District Council does not have any objection to this approach.	Low
Requirements	The Applicant has set out in its proposals for the provision of cycle parking and	The District Council recommends that cycle parking at the new facility would need to be	Low



facilities within the Design Code (App	sufficient to cater for staff requirements and	
Doc Ref 7.17) [REP5-109] which includes,	should accord with adopted cycle parking	
Cycle facilities should be provided to	standards. It is agreed this addition in the	
encourage travel to site via sustainable	Design Code is acceptable.	
means, Cycle parking will be covered		
and secure, Showers and changing		
facilities will be provided for staff		

4.8 Health

- 4.8.1 The Environmental Statement Volume 4, Chapter 12 (App Doc Ref 5.2.11) [REP4-028] 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) [APP-059] and Appendix 12.1 Health Screening (App Doc Ref 5.4.12.2) [APP-112] and Chapter 12 Appendix 12.3 Health Evidence Review (App Doc Ref 5.4.12.3) [REP5-066].

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Assessment Approach The assessment presented in Environmental Statement Chapter 12 Health (App Doc Ref 5.2.11) [REP4- 028] including the data gathering methodology, geographical study area, baseline, scope of the assessment and the assessment methodology set out is appropriate.	Agreed	The 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].	Low
Range of Stakeholders	Review Consultation summary report	The previous engagement with this hard to reach	Low
SCDC seek further clarity on the	and Community Liaison Plan and/or	reach group and the future engagement has discussed	
acceptance of the range of stakeholder	discuss further	the future engagement with both SCDC and CoCC and	



consulted as part of the consultation process particularly in relation to the Gypsy, Roma, Traveller community.		how this engagement can best be secured. Agreed wording will be added at Deadline 6 to the Community Liaison Plan (App Doc Ref 7.8) [REP4-078] to add reference to the use of other agencies in contact with the traveller population eg the Ormiston Trust (or similar) as well as with the GRT Liaison Officer to support engagement with this group. In addition, the Applicant has confirmed that it will update section 4.2 to acknowledge that engagement with the community organisation to be contacted will be facilitated by use of suitable material such as use of imagery, leaflets and diagrams.	
		The Applicant will Update table 6-1 within the CLP to include hard to reach groups and indicate engagement for a mechanism with specific reference to continued engagement through established relationship with the SCDC Traveller Liaison Officer. These updates will be made at Deadline 6.	
Traffic Monitoring SCDC will continue to review at the discharge of requirements 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 at the discharge of requirements stage.	The District Council would defer all matters relating to traffic and transport to the County Highway Authority and this includes any amendments required by the ExA at deadline ISH4 for review at ISH5.	Medium
Health and Wellbeing The assessment approach and methodology presented within the Health Mental Wellbeing Impact		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).	Low



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. Community Liaison Plan	Reviewed and agreed that this will be		Low
-	managed through final agreement to the Community Liaison Plan [REP4-078].		LOW
Mitigation	The Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [REP5-050] has been updated to include a section on recruitment, at the time of the discharge of requirements, which sets out the Applicant's commitment to local advertising and apprenticeships in line with the Applicants response to ExQ1 7.36. The Applicant is happy to agree to local advertisement platforms with SCDC, however, the Applicant believes exclusive early local advertisement may have a negative impact on attracting local candidates many of which access recruitment opportunities through national recruitment channels.	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. The District Council is satisfied with this approach.	Low
Other Requirements	The Applicant notes the comments. There is already lighting in place along the Horningsea Road. Any further lighting will be agreed prior to adoption with the CoCC.	Lighting along Horningsea Road will be adopted by Local Highways who have their own requirements for adoption. Confirmation that the proposed mitigation has been agreed with Local Highways has been provided.	Low



4.9 Historic Environment

- 4.9.1 The Historic Environment of the Environmental Statement (App Doc Ref 5.2.13) [REP5-036] 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 [AS-079].
- 4.9.3 The Assessment is supported by the Gazeteer of Assets (App Doc Ref 5.4.13.2) [AS-081] the Historic Landscape Classification (App Doc Ref 5.4.13.3) [AS-083] and the Historic Environment Impact Assessment tables (App Doc Ref 5.4.13.4) [REP5-068].
- 4.9.4 The plans and figures in support are set out in the Historic Environment Plans (App Doc Ref 4.17) [AS-159] and the Book of Figures (App Doc Ref 5.3.12) [APP-059].

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
Classification The impact assessment in respect of Biggin Abbey as a "temporary minor adverse	The Level of Less than substantial harm is not agreed. The level of harm	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	High

Table 4.9: Details of the summary and status of agreement on Historic Environment



impact" paragraph 4.2.12 (App Doc Ref 5.2.13 Table 2-2) [REP5-036].	after the application of mitigation has been assessed as being in the middle of the spectrum of Less than Substantial Harm.	heritage value and an impact assessment of temporary moderate adverse effect would better reflect the impact.	
The operation of the proposed development in the opinion of SCDC equate to minor/moderate adverse effect not the negligible adverse effect presented.	The Level of Less than substantial harm is not agreed. The level of harm after the application of mitigation has been assessed as being in the middle of the spectrum of Less than Substantial Harm.	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.	The Level of Less than substantial harm is not agreed. The level of harm after the application of mitigation has been assessed as being in the middle of the spectrum of Less than Substantial Harm.	The 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) [REP4-032] and is supported by the LVIA Methodology at Chapter 15 Appendix 15.5 App Doc Ref 5.4.15.5 [APP-131]



4.10.3 The book of supporting figures is produced at 5.3.15 [AS-048].

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 Ref 5.2.15) [REP4-032] including		Character definitions based on site	
the data gathering methodology, baseline, scope of the		surveys and desk-based review. The local	
assessment and the assessment methodology set out is		character areas defined are accepted and	
appropriate.		found to be generally aligned with the	
		GCLCA notwithstanding that it has not	
		been referenced.	
Design Approach	The Applicant has provided further	It is considered however that the	Low
The design approach and its suitability in the location is	information relating to the	applicant has provided as much	
not agreed. Consideration of alternative measures,	establishment of the bund	consideration as possible to the planting	
monitoring and mitigation should the trees and	Appendix H [REP 4-087] and has	atop the bund to try to ensure the long-	
vegetation in the location fail to thrive is included in the	updated the LERMP at Deadline 4	term survival of the plants. Whilst it is	
Landscape Ecology and Recreational Management Plan	[REP4-056], THE Design Code REP4-	impossible to be sure that any	
(App Doc Ref 5.4.8.14) [REP5-062] including the	085 and the associated dDCO	combination of maintenance and climate	
suitability of the use of the soils excavated from the	Requirements.	will assure longevity and thriving of the	
footprint and pipeline excavations for the elevated		plants, there is little more that can be	
bund.		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. SCDC is therefore satisfied with	
		the proposals.	

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) [REP5-026] 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) [APP-084]
- 4.11.3 The supporting figures are provided at 5.3.7 Environmental Statement Volume 3 Book of Figures Air Quality [APP-056]

Statement/document on which	AW Comments	SCDC Comments	Status
agreement is sought.	A successful	In some welter was the District Courseil is	•
Assessment Approach	Agreed.	In general terms, the District Council is	Low
The assessment presented in		satisfied with the scope, methodology and	
Environmental Statement Volume 2		the conclusions derived from the Air Quality	
Chapter 7 Air Quality (App Doc Ref		Chapter of the ES [Doc ref 5.2.7] [REP5-026].	
5.2.7) [REP5-026] including the data			
gathering methodology, baseline, scope			
of the assessment and the assessment			
methodology set out is appropriate.			

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

4.12 Odour

- 4.12.1 The Odour chapter of the ES Chapter 18 (App Doc Ref 5.2.18) [REP5-044] 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) [AS-104]
- 4.12.3 The assessment is supported by the Book of figures ES Volume 3 Chapter 18 (App Doc Ref 5.3.18) [APP-065].
- 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) [AS-106].

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 Applicants position is as presented in the	The District Council is in agreement with the	Low
The assessment presented in	updated REP5-026 and REP5. The correct	scope and methodology of the assessments of	
Environmental Statement Volume 2	classification is "moderately offensive"	odour [Doc. Ref. 5.2.18] [REP5-044 and	
Chapter 7 Air Quality (App Doc Ref 5.2.7)		REP5-045]. However, it should be noted that	
[REP5-026 and REP5-027] including the		the odour contours have been modelled on	



data gathering methodology, baseline,	the assumption that the offensiveness of the
scope of the assessment and the	odour is considered "moderately offensive"
assessment methodology set out is	rather than "highly offensive". This is on the
appropriate.	basis on the relevant guidance stated that
	sewage works, operating under normal
	conditions, should be considered as such. This
	appears to be a conservative approach to
	odour and it is felt that it would be beneficial
	to consider the odour as "highly offensive" to
	provide some assurance that identified
	sensitive receptors are unlikely to be affected.
	SCDC do not disagree with the methodology
	or mitigation measures
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.
	Whilet the proposed mitigation is considered
	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.
	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 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) [REP4-032] 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) [REP5-054] and the Code of Construction Practice (Appendix 2.1 App Doc Ref 5.4.2.1) [REP5-050]

Table 4.13: details the summar	y and status of	f agreement oi	n Lighting.
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Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Assessment Approach The assessment presented in Environmental Statement Chapter 15 (App Doc Ref 5.2.15) [REP4- 032] including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.	More detailed assessments of the impacts will be undertaken as part of the local impact report	SCDC accepts the assessment presented in Environmental Statement Chapter 15 (App Doc Ref 5.2.15) [AS-034 and AS-035] including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.	Low
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	Medium



		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.	
Requirements	To be managed at the discharge of 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.	Low

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) [REP5-042] 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) [APP-133] 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) [APP-064].
- 4.14.4 An outline [noise management plan is provided at as part of the Outline Construction Environmental Management Plan CEMP [App Doc Ref 5.4.2.7) [AS-057] this is secured in Requirement [] of the draft DCO (App Doc Ref 2.1) [REP5-003]
- 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) [REP5-042]. including the data gathering		Vibration Chapter (Chapter 15) of the ES	
methodology, baseline, scope of the assessment and the		[Doc ref.5.2.17] [REP5-042]. The District	
assessment methodology set out is appropriate.		Council notes that the CEMP makes	



<u>Assessment conclusion</u> Subject to the implementation of agreed mitigation measures there will be no likely significant noise and vibration effects during the construction, operation or decommissioning of the proposed development mitigation section of App Doc Ref 5.2.17 [REP5-042]	Agreed	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). The District Council notes that during the operational phase, monitoring of operational noise will be a requirement of the permit issued by the Environment Agency [Doc ref. 5.2.17] [REP5-042]. The monitoring parameters, duration, frequency and reporting will be specified in accordance with the permitting requirements. On this basis, the District Council considers no further requirements are required.	Low
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 recorded 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	Low



		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] [REP5-042]. The District Council has not identified any additional mitigation measures for the development.	
Requirements		The District Council notes that during the operational phase, monitoring of operational noise will be a requirement of the permit issued by the Environment Agency [Doc ref. 5.2.17] [REP5-042]. The monitoring parameters, duration, frequency and reporting will be specified in accordance with the permitting requirements. On this basis, the District Council considers no further requirements are required.	Low
Emergency Generators (App Doc Ref 5.2.17) [REP5-042]	The proposed development includes provision for standby generators for operational resilience in the event of power supply interruption to critical processes. 1.1.2 These generators will be located at the proposed WWTP within the earthwork embankment in the Electric Supply and Power Generation area shown in Work Plans Sheet 11 (App Doc Ref 4.3) [REP5-017]	The Applicant has discussed the concerns raised by CoCC on the sensitivity of receptors selected within the noise and vibration assessment Chapter 17 of the Environment Statement Noise and Vibration (App Doc Ref 5.2.17) [REP5-042] and the assessment of the emergency generators. SCDC are in agreement that the emergency generators have now been assessed and whilst scoped out of the noise assessment ES Chapter 17 (App Doc Ref 5.2.17) [REP5-042] the reason for this is explained in the	Low



	briefing note that will be attached to	
	the updated Chapter 17 at Deadline 6.	

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) [REP5-022].

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	Low
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.			



5 Agreement on this SoCG

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

Name:	Mark Malcolm
Signature:	
Position:	Programme Director Major Infrastructure
On behalf of: Date:	Anglian Water Services Limited
Name:	
Signature:	
Position:	
On behalf of:	South Cambridgeshire District Council
Date:	



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-	TWG 11 March 2021
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.	
Agriculture and Soil Resources	
The Applicant and SCDC agree the need for and the proposed scope of the Agricultural Land Classification and Soil	Biodiversity TWG dated 26 April 2022
Management Plan and the adequacy of the Land Quality Assessment, Guidance to be followed in assessments to	
include; land contamination, sensitivity criteria and magnitude of impact.	Environmental Health TWG dated 29 April
The Applicant and SCDC agree the mitigation measures proposed in the CoCP to ensure works do not cause	2022
contamination of soils or impact upon human health.	
Air Quality	
The Applicant and SCDC agree the methodology applied to the Air Quality Assessments, the guidance to be followed	Environmental Health TWG 29 April 2022.
in assessments and maximum design scenarios and assessment criteria.	[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	TWG meeting 11 June 2021
and scoping assessment, the potential impacts to statutory designated sites and the potential impact to non-	
statutory designated sites.	
The Applicant and SCDC agree the methodology and assessments used for the EIA in advance of submission of the	TWG 18 August 2021
EIA scoping report	
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	TWG 3 February 2022
the Preliminary Environmental Information Report and LERMP.	
The Applicant and SCDC agree that Biodiversity Metric 3.0 will be used to calculate and evidence the Biodiversity Net	TWG 3 February 2022
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.	



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 East Cambridge AAP.	Meeting 20 June 2022
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 ¹ requirements and the NPPF ² 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.	TWG 7 December 2021
The Applicant and SCDC agree the LVIA viewpoints proposed for Consultation Phase 3 and Zones of Theoretical Visibility (ZTV's)	
The Applicant and SCDC agree the proposed approach to assessing impact upon the historic environment/heritage	
assets and the historic characterisation exercise.	TWG 1 February 2022
The Applicant and SCDC agree the Archaeological Investigation Strategy and approach to PEIR	
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. The Applicant and SCDC agree the LERMP responds to the guidelines in the Greater Cambridge Landscape Character Assessment (2021).	Workshop 15 June 2022

 $^{^{1}\,}$ 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 ² NPPF section 160 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf



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	TWG 1 February 2022
and proposed Community papers.	
The Applicant and SCDC agree the guidance to be followed in noise and vibration assessments, maximum design	Environmental Health TWG 29 April 2022.
scenarios, assessment criteria, significance construction and operational noise and proposal for Environmental	[email Kathryn Taylor to
Statement. The Applicant and SCDC agree the tunnelling and pipeline impacts and assessments and the need for	Officers 29 April 2022 and follow up e mail
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 Guidance on the assessment of odour for planning Version 1.1 – July 2018, Emission rates – as measured at	TWG 12 May 2021
existing WWTW for comparable processes or UK Water Industry Research (UKWIR) Odour Control in Wastewater	
Treatment emission rates, Mitigation measures considered in line with the NPS Statement for Waste Water and that	Environmental Health TWG 29 April 2022.
the objective will be "Negligible" impact at receptors (as defined in IAQM's guidance)	[email Kathryn Taylor to
The Applicant and SCDC agree the assessment methodology for the odour management plan, the guidance to be	Officers 29 April 2022 and follow up email
followed in assessments and the mitigation measures relevant to Odour. Maximum design scenarios and qualitative	dated [24 June 2022]
assessment.	
PROW	
The Applicant and SCD agree that there is unlikely to be an increased impact of anti-social behaviour as a result of	PRoW TWG 23 June 2022
the project and the Environmental Assessment that anti-social behaviour is likely to diminish.	
Recreation	
The Applicant and SCDC agree the scope and assessments undertaken to inform the Landscape, Ecological and	(scope and assessments agreed but topic
Recreational Management Plan (LERMP) and the measures set out in the CoCP and CTMP.	remains under discussion)
Traffic and Access	
The Applicant and SCDC agree the approach and structure of the Traffic Assessment to include; Policy review,	April 2021
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 single	TWG 26 April 2021
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 and	TWG 6 October 2021
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 and environmental assessment work together with the Junction capacity Assessment methodology, and junctions to be assessed.	TWG 22 January 2022
The Applicant and SCDC agree the update to the Traffic Assessment Scoping note and the scope of the proposed	12 April 2022
checking surveys. The Applicant and SCDC agree the proposed management plans included in the PEIR, CoMP, CTMP, Application of Best Practicable Means (BTM) and the CTMP and CEMP for Consultation Phase 3.	TWG 28 April 2022
Anglian Water and SCDC agree that the TTRO's required for Traffic Management will not be included in the DCO.	Meeting 13 May 2022
The Applicant and SCDC agree the scope of the 2021 traffic data checking surveys and Junction assessment summary to inform the Traffic Assessment.	TWG 30 June 2022
Water Resources	
The Applicant and SCDC agree the scope and assessment of Hydrological Impact assessment and agree that the risk of contaminant movement through the ground water is unlikely to move through the groundwater at sufficient concentrations or speed to impact any sensitive receptors.	Technical Water Meeting 17 May 2022



Get in touch

You can contact us by:

- Emailing at info@cwwtpr.com
 - Calling our Freephone information line on **0808 196 1661**
 - Writing to us at Freepost: CWWTPR

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

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

