



Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Statement of Common Ground: The National Trust

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1	01/03/2023	KT	
2	05/10/2023	KT	Updated following submission of relevant Representations and Rule 6 Letter dated 19 September 2023
<u>3</u>	<u>18/03/2024</u>	-	<u>Updated following review of Water Quality Monitoring Plan, the creation of Combined Recreational Group and submission of Deadline 5 written submissions.</u>

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1 Introduction

1.1 Purpose of this Document

- 1.1.1 This Statement of Common Ground (“SoCG”) is submitted as part of an application by Anglian Water Services Limited (“the Applicant”) for a Development Consent Order (DCO) under the Planning Act 2008 (‘the Application’) for the for the Cambridge Waste Water Treatment Plant (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 The National Trust (The Trust). The Trust is an independent charity that looks after countryside and historic buildings in England. The Trusts owns Anglesey Abbey (a Grade I Listed Building set within a grade II* Registered Park and Garden and an estate which extends over 46 hectares) which is situated approximately 2.4km to the north-east of the project site. In addition, The Trust owns and manages approximately 800 hectares of land at Wicken Fen which lies approximately 7.5km north-east of the project site.
- 1.1.4 This SoCG confirms the position of these two parties to their agreement or otherwise on CWWTPR Application. To date, The Trust have provided views on draft proposals at different phases of consultation of the design development.
- 1.1.5 This SoCG has been prepared by the Applicant and agreed with The Trust. Any reference to ‘the parties’ means the Applicant and The Trust.
- 1.1.6 This SoCG has been prepared to identify matters agreed, under discussion and not agreed the Applicant and The Trust.

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 2 confirms the pre-application consultation undertaken to date between the Applicant and The Trust;
 - Section 3 identifies the relevant documents on which the agreements recorded in this SoCG were reached;
 - Section 4 provides a summary of the status of agreement.

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

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

1.3 Status of the SoCG

- 1.3.1 This version, Version ~~32~~ of the SoCG represents the position between the Applicant and The Trust as of 19 March 2024 and represents the final position between the Parties. 5 October 2023 (covering the pre-application stage of the process and representing the submissions made within the Relevant Representations). The SoCG will continue to be reviewed and progressed through Examination.
- 1.3.2 A Principle Areas of Disagreement document will be updated and submitted to the Examining Panel during the examination to reflect where additional agreement or discussion is sought.

2 Consultation and engagement

- 2.1.1 The Applicant has engaged with the Trust concerning the project throughout ~~the pre-application~~ and Examination period.
- 2.1.2 Throughout the pre-application and Examination period the Applicant considered the Trust, a non-prescribed consultee, as ‘deemed to be prescribed’ and consulted them as a Section 42 consultee under the 2008 Act.
- 2.1.3 The Section 42 consultation ran in parallel to phase three community consultation, which involved consultation on the Preliminary Environmental Information Report (PEIR) and ran from 24 February 2022 – 27 April 2022. The Trust, as part of the Section 42 consultees, were consulted on the PEIR. The Trust were also consulted at the phase one statutory consultation under Section 47 of the 2008 Act from 23 June 2021 – 18 August 2021.
- 2.1.4 The Applicant committed to consulting technical consultees both before, during and after the statutory Section 42 consultation, through the formation of Technical Working Groups (TWGs) of which the Trust was a consultee of the Biodiversity and Ecology TWG.
- 2.1.5 Ongoing engagement to discuss consultation responses and key issues took place through the TWGs and stakeholders meetings and continued on key topics and issues raised in Relevant Representations and Written ~~Submissions~~Submissions. will continue as required on key topics.

3 Documents considered in this SoCG

3.1.1 In reaching common ground on the matters covered in this SoCG, the parties have considered and refer to the Consultation material for Phase 1,2 and 3, the Preliminary Environmental Report (“PEIR”), and

- a) The Landscape, Ecology and Recreational Management Plan Environmental Statement (LERMP) (App Doc Ref 5.4.18.14) [\[REP5-062\]](#),
- b) The Biodiversity Chapter of the Environmental Statement Volume 2 (App Doc Ref 5.2.8), [\[REP5-028\]](#)
- c) The Water Resources Chapter of the Environmental Statement (App Doc Ref 5.2.20) [\[REP4-036\]](#)
- d) [Outline Water Quality Monitoring Plan \(App Doc Ref 5.4.20.13\) \[REP5-083\]](#).

4 Summary of Status of Agreement

Table 4.1: Summary of Status of agreement

Matter	Record of engagement	Status
Engagement Process		
The parties accept the need for pre-application engagement to minimise risk of abortive or unnecessary pre-application submission work or the need for additional assessment post application submission and are willing to attend TWG when available and one to one meetings, if needed.	TWG 11 March 2021	Low
Principle of Development and Green Belt Impact		
<p>National Trusts position is that: The Applicant state in the submitted Planning Statement (Doc Ref: AS-128, Para.2.4.24) that there is no operational need or requirement to replace the existing waste water treatment plant. However, there is an interdependency between this application and emerging proposals for the redevelopment of the existing wastewater treatment site in Milton. Although it is currently unclear how many new homes will be required over the new Local Plan period.</p> <p>It is clear from documents prepared by Greater Cambridge Shared Planning that the regeneration of northeast Cambridge has been a long-held ambition for the Councils. However, Greater Cambridge Shared Planning will not commit to including the site within the draft Local Plan or adopt the North East Cambridge Area Action Plan (NECAAP) until such time that a Development Consent Order is granted for the relocation of the Waste Water Treatment Plant. The proposed site is not allocated in the National Policy Statement (NPS) for Waste Water or the Minerals and Waste Local Plan. Furthermore, it is not identified in the Environment Agency's National Environment Programme (NEP).</p>		High



The proposed development would result in the loss of greenfield land within the Cambridge Green Belt. The Applicant's position is that the site makes a strong contribution to two of the Green Belt purposes and would have a moderate impact on adjacent Green belt land as a result of its encroachment into the countryside.

The proposed development would constitute inappropriate development. The Applicant is promoting the application on the grounds that the very special circumstances required to justify the granting of the DCO are demonstrated. The Applicant state that the harm would be outweighed by the need for the proposed development and the substantial public benefits it will deliver.

The National Trust's position on development in the Green Belt is that it must be carefully managed, and speculative development is not appropriate. The Trust acknowledges that there are some limited circumstances where development is acceptable, or where very special circumstances are clearly demonstrated which might outweigh harm to the Green Belt. Whether the very special circumstances put forward by the Applicant justify the grant of development consent will be a matter for the Secretary of State.

Landscape and Ecology

The Parties agree the agree the LVIA viewpoints proposed for Consultation Phase 3 and Zones of Theoretical Visibility (ZTV's) and that the assessment and approach is appropriate.	Meeting 7 December 2022	Low
The Parties agree the assessment approach in the submitted LERMP (App Doc Ref 5.4.8.14) and that the development should provide at least 20% Biodiversity Net Gain.		Low
The Applicant and The Trust agree the methodology and assessments used for the EIA in advance of submission of the EIA scoping report	TWG 18 August 2021	Low
The Applicant and The Trust agree the proposed approach to the PEIR and the topics for the Environmental Information chapters.	TWG 18 November 2021	Low



<p>The Applicant and The Trust agree that Biodiversity Metric 3.0 will be used to calculate and evidence the Biodiversity Net Gain (“BNG”) requirements for the project.</p>	<p>TWG 3 February 2022 and meeting on 28 March 2022</p>	<p>Low</p>
<p>The Trust notes the assessment approach in the submitted LERMP (App Doc Ref 5.4.8.14). However, it considers the proposals should extend to the entire project area and not just the proposed WWTP.</p> <p>The Trust’s view is that the Landscape Masterplan proposals in the LERMP should extend beyond the development boundaries and meaningfully contribute to ecological restoration and enhancement in the southern area of the Wicken Fen Vision area as well as providing enhanced recreational access opportunities and access to nature. At present ecological enhancement beyond the development site and at landscape scale is limited and should be explored further in the context of the Wicken Fen Vision objectives.</p> <p>Given the scale and significance of this development as a Nationally Significant Infrastructure Project, the proposed development of a greenfield site and the location of the site in the Green Belt and the Wicken Fen Vision Area, the Trust considers that the proposed development should be contributing significantly more towards the Local Nature Recovery Strategy and strategic Green Infrastructure initiatives, to benefit people, nature and climate. There are opportunities in the wider area to provide better access for multiple users and deliver landscape scale enhancements working in partnership with other Conservation partners.</p>	<p>28 March 2022</p>	
<p>Hydrological Impact Assessment</p>		
<p>The Trust note the scope and assessment of Hydrological Impact assessment, the dewatering contaminant transport modelling and impact assessment of permeability. In its Relevant Representation, the Trust raises concern that there are possible pathways between the site and Wicken Fen Ramsar/Fenland SAC and Anglesey Abbey CWS.</p> <p>The Trust wishes to ensure that appropriate monitoring of water levels and water quality is in place before construction, during construction and during operation. On & off-site monitoring is</p>	<p>Meeting 5 July 2022</p>	



required to determine impacts on sensitive receptors, including potential pathways to impact our sites.

In its Relevant Representation, the Trust raised concerns related to the proposed dewatering of the site, the high permeability in the bedrock and the potential for works and operations associated with the development to transmit pollution to groundwater. The Trust wishes to ensure that appropriate monitoring of water levels and water quality is in place before construction, during construction and during operation. On & off-site monitoring is required to determine impacts on sensitive receptors, including potential pathways to impact our sites.

[In response to these concerns an additional monitoring plan was prepared for agreement with Stakeholders Outline Water Quality Monitoring Plan \(App Doc Ref 5.4.20.13\) \[REP5-083\].](#)

[The Parties will refer to the Outline Water Quality Monitoring Plan which is with the Environment Agency for agreement. It is expected that this will be submitted as a final document to the DCO Application at Deadline 2. The Trust has now reviewed the Outline Water Quality Monitoring Plan submitted at Deadline 2 and which has agreed with the Environment Agency and Natural England.](#)

[The National Trust notes the submission of the Outline Water Quality Monitoring Plan \(REP2-028\). The Trust reviewed the draft document and provided comments to the Applicant prior to its submission and to the Examining Authority in its response to the Second Written Questions \(ExQ2\). The Trust welcomes the proposed monitoring at, Stow cum Quy Fen SSSI, Black Ditch, Allicky Farm Pond. The Trust is also pleased that it will be added to the list of recipients in Table 5.1.](#)

[However, the Trust remains of the opinion that loggers are more accurate and more likely to pick up subtle changes and variations throughout the year. The Trust also considers that the boreholes should be protected during construction, but note that the Environment Agency will approve any changes. The Trust defers to the advice of the statutory advisors on these matters and notes that the Environment Agency and Natural England have advised that they are satisfied with the Outline Water Quality Monitoring Plan.](#)

[Review of Outline Water Quality Monitoring Plan will be undertaken once agreed by the Applicant with the Environment Agency.](#)

Written submission
19 February 2024 [and meeting of 19 March 2024](#)



Low



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[The National Trust will be added to the table at 5.1 of the Outline Water Monitoring Report as a recipient of the monitoring reports for baseline, pre-construction and construction periods at Deadline 6.](#)

Recreation and Public Rights of Way

The National Trust generally supports the proposals for enhanced recreational connections and public access through new paths and green space. The Trust welcomes the proposed new bridleway access but consider that it does not connect well to Anglesey Abbey and does not provide a direct route. During pre-application discussions the National Trust requested that the Applicant explore the possibility of extending the new bridleway along the dismantled railway route to make this connection to Anglesey Abbey and is disappointed that this cannot be achieved.

28 March 2022

The Trust considers that the impacts on the Stow Cum Quy SSSI and surrounding area have not been adequately assessed. The assessment is missing robust baseline visitor surveys, a recreational impact assessment and a recreational management strategy including appropriate mitigation measures.

[Review with consideration to submitted draft section 106 agreement.](#)

The Trust also considers the impacts of this application must be considered cumulatively with uplift in recreational use of the area associated with the proposed housing growth which will be delivered through the existing and emerging Local Plan, including the housing which will be enabled by the proposed development.

[The National Trust is included as a member for the Combined Recreational Group. The Applicant convened the first meeting of a wider area group \(known as the "Combined Recreational Group" on 24 January 2024. The operation of this group is not directly linked to the proposed development but recognises the wider regional pressures on sites such as Stow cum Quy SSSI, and that they may be subject to increased user pressure in the future as a result of strategic housing growth in the wider area.](#)

[Meeting 24 January 2024](#)

[Written submission 19 February 2024](#)

The Applicant [will commit an appropriate level of financial contribution towards the establishment and governance structures of this group, and a financial commitment towards](#)

[E-mail 18 March 2024 Meeting 19 March](#)



[further baseline monitoring work and mitigation measures which will be secured through the s.106 agreement. The allocation of this financial commitment will be determined by the Combined Recreational Group](#) [2024.](#)



Traffic and Access

The Applicant and The Trust agree the preferred access option is option 1 which both utilises the existing junction 34 of the A14 and would therefore have no or negligible impact on the Trust's operations at Anglesey Abbey.

Consultation
Response
Consultation Phase 2.



6 Agreement on this SoCG

This Statement of Common Ground has been jointly agreed by:

Name: Mark Malcolm

Signature: 

Position: Programme Director Major Infrastructure

On behalf of: Anglian Water Services Limited

Date: _____

Name: Oliver Burke

Signature: 

Position: Assistant Director of Operations

On behalf of: The National Trust

Date: 26.03.24

Get in touch

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Visiting our website at www.cwwtpr.com

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

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