

Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Planning Statement: Local Policies Accordance Tables

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Summary

The Policy Accordance Tables list all adopted development plan policies (Table A) and all emerging development plan policies (Table B) which are considered relevant to the Proposed Development and consider the extent to which the Proposed Development accords with these policies.

Policy Accordance Table A – Adopted Local Plans

South Cambridgeshire Local Plan 2018

Policy	Assessment
<p>S/1 The vision provides for sustainable economic growth with residents having a superb quality of life in an exceptionally beautiful, rural and green environment.</p>	<p>The PD aligns with this vision by allowing sustainable economic growth by releasing a major brownfield site in Cambridge.</p>
<p>S/2 Sets out 6 key objectives;</p> <ul style="list-style-type: none"> a. to support economic growth and South Cambridgeshire’s position as a world leader in research and technology based industries, research, and education, and supporting the rural economy; b. to protect the character of South Cambridgeshire, including built and natural heritage, protecting the GB, new development should enhance the area, and protect and enhance biodiversity; c. To provide land for housing; d. to deliver high quality well-designed development; e. to ensure new development provides or has access to a range of services and facilities that support healthy lifestyles and well-being; and f. to maximise potential for journeys to be undertaken by sustainable modes. 	<p>The PD will release a major site adjacent to the Cambridge Science Park which has the potential to provide a mix of uses to support South Cambridgeshire and Cambridge as a world leader in research and technology based industries.</p> <p>The PD, whilst in the Green Belt, benefits from very special circumstances to justify the development.</p> <p>The land released by the relocation of the PD will allow 8,350 homes and associated facilities to be developed in a sustainable location.</p> <p>The PD has followed a detailed design evolution to minimise its impact on the Green Belt.</p> <p>The PD provides new infrastructure which will replace the existing WWTP and the release of the vacated site will allow new development to occur in a location that has access to a range of services and facilities.</p> <p>Similarly the PD will allow more effective use of the existing site to maximise the potential for journeys to be undertaken by sustainable modes as it is adjacent to a railway station, guided busway and cycle paths to the city centre.</p>
<p>S/3 Accords with the presumption in favour of sustainable development as set out in the 2012 NPPF.</p>	<p>The PD accords with the presumption in favour of sustainable development as it will release a major previously developed site for housing and associated development in a sustainable location.</p>
<p>S/4 Defines the Cambridge Green Belt and states that new development in the</p>	<p>The PD conflicts with the policy <u>unless</u> very special circumstances are demonstrated. There are very special circumstances to justify the PD</p>

<p>Green Belt would only be permitted in accordance with national Green Belt policy.</p>	<p>in the Green Belt which are detailed in the Planning Statement. Acceptance by the Secretary of State that these considerations clearly outweigh the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the Proposed Development, would mean consistency with SCDC Local Plan Policy S/4 and, based on the measures incorporated in the design and delivered through ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [REP6-065] to mitigate Green Belt impact, SCDC Local Plan Policy NH/8</p>
<p>S/5 Development will meet the needs for 22,000 additional jobs to support the Cambridge Cluster and provide a diverse range of local jobs. The Plan provides for 19,500 new homes.</p>	<p>The PD will release a major site for redevelopment which will also include commercial floorspace which will support the Cambridge Cluster</p>
<p>S/6 Sets out a development strategy for homes and jobs in the following order of preference having regard to the purposes of the Cambridge Green Belt: on the edge of Cambridge, at new settlements, in the rural area at rural centres and minor rural centres. This includes a new town at Waterbeach of 8,000 to 9,000 homes.</p>	<p>The PD will enable the release of a sustainable site within Cambridge for redevelopment which is the preferred location in the development strategy.</p>
<p>S/7 Provides that outside development Frameworks only development for, amongst other things, uses which need to be located in the countryside or where supported by other policies in the plan would be permitted.</p>	<p>The PD is located in the countryside and needs to be located in the countryside for a number of reasons including proximity to the River Cam and for odour mitigation purposes. The rationale for the development is to enable regeneration and the establishment of a new highly sustainable urban quarter in Cambridge.</p>
<p>S/13 Provides for a review of the South Cambridgeshire Local Plan to commence before the end of 2019.</p>	<p>The PD will help release a large strategic site to deliver 8,350 houses at a most suitable location in Cambridge during the new local plan period, which forms part of the key housing delivery strategies of the emerging Greater Cambridge Local Plan.</p>
<p>SS/4 Provides the allocation at Cambridge Northern Fringe East</p>	<p>The PD will release the existing site to be redeveloped which has been a policy objective for many years.</p>

<p>SS/6 Provides for Waterbeach New Town</p>	<p>The PD will also provide supporting infrastructure for the Waterbeach New Town.</p>
<p>CC/1 Concerns mitigation and adaptation to climate change.</p>	<p>The PD has considered climate change and has incorporated this into the design.</p>
<p>CC/2 and CC/3 Deal with renewable and low carbon energy generation.</p>	<p>The PD includes renewable and low carbon energy generation, for example in the form of anaerobic digestion.</p> <p>The Applicant's proposals for the Proposed Development are fully aligned with the requirements of Policy CC/3 and indeed the renewable energy provisions greatly exceed the 10% target.</p> <p>Under both the preferred option and the alternative option, carbon emissions reduction due to renewable energy (from either biomethane export or CHP generation) greatly exceed the 10% target stated in Policy CC/3. In both cases, additional solar power generation would not be needed to achieve the 10% target. The 10% target is exceeded even if we consider future decarbonisation of the power grid, which reduces the impact of both power use and (for the alternative CHP option) power generation by the Proposed Development. For the preferred option the 10% target would still be exceeded even if we assume that the gas grid is partially decarbonised as a result of future inject of biomethane from other anaerobic digestion plants across the country (there are no reliable forecasts for future biomethane production, however, we consider that an optimistic range for biomethane content in the gas grid might be 25% - 50% by 2050).</p> <p>The optimal mix of technologies (biomethane export, solar, battery storage, CHP) will be determined at the detailed design phase in accordance with the DCO Requirements. However, under all options the Proposed Development will exceed the 10% carbon emissions reduction target stated in Policy CC/3</p>

<p>CC/4 Concerns water efficiency.</p>	<p>The PD seeks to minimise the amount of water used in the treatment works.</p> <p>The Applicant is now securing BREEAM excellent through the Design Code under code PER.01 [The Gateway Building and the Workshop Building should achieve a BREEAM Excellent Rating, in line with local planning requirements.] The Gateway Building will achieve the maximum number of water credits (5no.) under Design Code PER.03 (in accordance with the Greater Cambridge Sustainable Design and Construction SPD 2020).</p>
<p>CC/6 Concerns construction methods.</p>	<p>Detailed construction management plans have been submitted which show how the PD will comply with this policy.</p>
<p>CC/7 Concerns water quality.</p>	<p>The PD will have a higher quality discharge to the River Cam than the existing site. Measures will also be taken to prevent water pollution during construction.</p>
<p>CC/8 Concerns sustainable drainage.</p>	<p>The PD includes sustainable surface water drainage measures and has taken opportunities for enhancing biodiversity and amenity space as part of the scheme.</p>
<p>CC/9 Concerns flood risk.</p>	<p>The PD location has avoided flood risk areas and there will be no increased risk to flooding elsewhere.</p>
<p>HQ/1 Requires high quality design. As appropriate to the scale and nature of the development, proposals must, amongst other things:</p> <ul style="list-style-type: none"> a) preserve or enhance the character of the local rural area and respond to its context in the wider landscape b) conserve or enhance important natural and historic assets and their setting, and d) be compatible with its location and appropriate in terms of scale, density, mass, form, siting, design, proportion, materials, 	<p>The PD has been designed to preserve and enhance the character of the local area and to be appropriate in terms of scale and the other relevant criteria in this policy. The Design and Access Statement addresses these matters in more detail.</p>

<p>texture and colour in relation to the surrounding area.</p>	
<p>NH/2 Permits development where it respects and retains, or enhances the local character and distinctiveness of the local landscape and of the individual National Character Area in which it is located.</p>	<p>The Landscape and Visual Impact Assessment addresses these matters and concludes that whilst there is an impact on the landscape it is considered acceptable in landscape policy terms with the included landscape mitigation.</p>
<p>NH/3 Provides that planning permission would not be granted for development which would lead to the irreversible loss of Grades 1,2 or 3a agricultural land unless</p> <ul style="list-style-type: none"> i) The land is allocated for development ii) Sustainability considerations and the need for the development are sufficient to override the need to protect the agricultural value of the land. 	<p>The PD is situated on Best and Most Versatile Land, however, the sustainability considerations and need for the development are sufficient to outweigh the loss of the BMV land.</p>
<p>NH/4 States that new development must aim to maintain, enhance, restore or add to biodiversity.</p>	<p>The PD will deliver a Biodiversity Net Gain of 20% and is therefore adding to biodiversity in accordance with the policy.</p>
<p>NH/5 seeks to protect sites of biodiversity or geological importance</p>	<p>The PD will not adversely affect any sites of biodiversity or geological importance.</p>
<p>NH/6 Green Infrastructure</p>	<p>In relation to criterion 1, the proposed development will not build on any green infrastructure including existing open space, sports or recreational land, and therefore, the proposed development will not cause harm or loss of the green infrastructure network in the district. As such, the proposed development complies with criterion 1.</p> <p>It is also important to note that recreational connectivity is central to the design of the Proposed Development by providing connections to the existing PRoW and a new</p>

	<p>bridleway, which aligns with the objective set out in criterion 2 of SCLP Policy NH/6.</p> <p>Section 2.9 (Mitigation measures adopted as part of the Proposed Development) of Environmental Statement Chapter 8: Biodiversity [REP6-015] sets out the mitigation measures included in the Proposed Development which aim to conserve and enhance biodiversity through improvement of green infrastructure. This includes a Landscape, Ecological and Recreational Management Plan (LERMP) (REP6-065) and landscape design masterplan. These have been developed to complement regional and local initiatives including the Wicken Fen Vision; the 22-hectare footprint of the plant is encircled by a landscaped and planted earth bank situated within the broader LERMP area of around 70-hectares. This would help contribute toward the delivery of green infrastructure within the Wicken Fen Vision area, consistent with its inclusion as a targeted area within the Green Infrastructure Strategy Network. This is in line with the objective of criterion 3 of Policy NH/6. This is a particularly important part of the Proposed Development to deliver biodiversity benefits. As this will also contribute towards the enhancement of the green infrastructure network within the district, this measure is in line with the requirement of criterion 4.</p> <p>The other mitigation measures developed, which are in line with objectives set out in SCLP Policy NH/6 to conserve and enhance green Infrastructure also include:</p> <ul style="list-style-type: none"> • design measures as part of the outfall to minimise loss of riparian habitat; • specific measures within the LERMP (REP6-065) in relation to controls on lighting; and • Measures included within the Code of Construction Practice (CoCP) (REP6-049) including, but not limited to, section 7.2 (Ecology and Nature Conservation) in Part A. As demonstrated above, the proposed development complies with all elements of SCLP Policy NH/6.
<p>NH/8 States that any development in the Green Belt must be located and designed so that it would not have an</p>	<p>The Landscape Masterplan would deliver a significant area of green infrastructure which would provide screening and help to reduce the</p>

<p>adverse effect on the rural character and openness of the Green Belt.</p>	<p>visual impact of the Proposed Development to retain openness of the Green Belt.</p> <p>Green Belt Impact Assessment of the Proposed Development (Application Document Reference 7.5.3) concludes that after mitigation, the Proposed Development would in addition to the harm by reason of its inappropriateness, cause moderate harm to the openness of the Green Belt and moderate harm to at least two of the purposes of including land in the Green Belt as a result of its encroachment into the countryside. There are very special circumstances to justify the PD in the Green Belt which are detailed in the Planning Statement. Acceptance by the Secretary of State that these considerations clearly outweigh the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the Proposed Development, would mean consistency with SCDC Local Plan Policy S/4 and, based on the measures incorporated in the design and delivered through ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [REP6-065] to mitigate Green Belt impact, SCDC Local Plan Policy NH/8. SCLP Policy NH/8 requires development proposals in the Green Belt to be located and designed so that they do not have an adverse effect on the rural character and openness of the Green Belt. SCLP Policy NH/8 further states that developments will need to include high quality and careful landscaping and design measures, alongside a requirement that any planting be adequately maintained, to ensure mitigation of any impact on the Green Belt. The Proposed Development includes a fully mitigated outline design and the landscape masterplan and LERMP [REP6-065] are designed to reduce landscape and visual impacts, improve biodiversity and create opportunities for greater recreational use of the countryside. It is considered that the requirements of this policy can be met through the application and management of the robust landscape strategy.</p>
<p>NH/14 Supports development proposals when they sustain and enhance the special character and distinctiveness of</p>	<p>As set out in ES Chapter 13, with the application of the primary, secondary and tertiary mitigation described in ES Chapter 15 Landscape and Visual Amenity and within the</p>

<p>the South Cambridgeshire District Council's historic environment.</p>	<p>LERMP (Application Document Reference 5.4.8.14 [REP6-065]), it is predicted that the level of harm on these heritage assets will be at the lower end of less than substantial harm.</p> <p>The substantial need for the Proposed Development and benefits set out in section 2 of the Planning Statement, it is considered that the harm to the heritage assets identified is outweighed by the public benefits and need for the relocation of the existing Cambridge WWTP.</p>
<p>E/1 Supports employment development on Cambridge Science Park where they enable the continued development of the Cambridge Cluster of high technology research and development companies.</p>	<p>The PD will release a major site adjacent to the Cambridge Science Park providing the opportunity for redevelopment to deliver a mix of uses to support South Cambridgeshire and Cambridge as a world leader in research and technology based industries.</p>
<p>E/9 States, amongst other things, that development proposals in suitable locations will be permitted which support the development of employment clusters, drawing on the specialisms of the Cambridge area in certain specified sectors, along with other locally driven clusters as they emerge.</p>	<p>The PD will release a major site adjacent to the Cambridge Science Park providing the opportunity for redevelopment to deliver a mix of uses to support South Cambridgeshire and Cambridge as a world leader in research and technology based industries.</p>
<p>SC/2 Requires Health Impact Assessment</p>	<p>Potential impact on human health are considered at Chapter 12 of the Environment Statement.</p>
<p>SC/9 Permits development which includes new external lighting only where it can be demonstrated that lighting and levels are the minimum required for reasons of public safety and security, and there is no unacceptable adverse impact on the local amenity of nearby properties, or on the surrounding countryside.</p>	<p>Chapter 2 Project Description of the Environment Statement (Application Document Reference 5.2) sets out that there will be lighting implemented in relation to construction activities and the operation of the proposed WWTP. Chapter 15 Landscape and Visual of the ES (Application Document Reference 5.2) sets out the effects of lighting arising from the Proposed Development.</p> <p>A Statement of Statutory Nuisance (Application Document Reference 7.13) has been prepared in respect of the Proposed Development. This concludes that based on the mitigation measures proposed in the Lighting Strategy, no nuisance is anticipated in</p>

	<p>respect of lighting of the Proposed Development during construction and operation.</p> <p>Requirement 14 of the dDCO (App Doc Ref 2.1)[REP5-003] requires detailed construction lighting design strategies to be submitted to and approved by the relevant planning authority. Additionally, the Code of Construction Practice Part A (App Doc Ref 5.4.2.1)[REP6-049] provides for control of construction lighting (section 5.9) including relevant specifications (5.9.5). Section 5.4 of the Lighting Design Strategy (App Doc Ref 5.4.2.5)[REP6-055] (secured through Requirement 7 (Detailed Design) of the dDCO (App Doc Ref 2.1)[REP5-003]) addresses mitigation of lighting.</p>
SC/10 concerns noise pollution	<p>As justified and concluded in the Noise and Vibration chapter of the Environmental Statement (Chapter 17, App Doc Ref 5.2.17), with the implementation of mitigation measures during construction, there will be no significant effects in respect of the Proposed Development. During operation, there would also be no significant effects in respect of noise and vibration. To this regard, it is considered that the Proposed Development is compliant with this policy.</p>
SC/11 Concerns contaminated land.	<p>As set out in Land Quality chapter of the Environmental Statement (Chapter 14, App Doc Ref 5.2.14), the design of sub-surface structures is informed by surveys to understand ground conditions so that the design is appropriate to the conditions within the land required for the Proposed Development.</p>
SC/12 concerns the impact on air quality	<p>Air Quality chapter of the Environment Statement (Application Document Reference 5.2) sets out the assessment and findings in respect of the Proposed Development and justifies that the PD would not lead to any breach in the air quality thresholds required by the policy.</p>
SC/14 Concerns Odour and Other Fugitive Emissions to Air	<p>Odour impacts during the construction of the Proposed Developments are considered negligible and not significant. During normal operation, the results of the odour modelling reported in Chapter 18 Odour of the Environment Statement</p>

	<p>(Application Document Reference 5.2.18) conclude that impacts are not significant. During the unlikely periods of abnormal operation, taking into consideration the secondary mitigation measures, the residual effect would be negligible and not significant. It is therefore considered that the Proposed Development is in accordance with this policy.</p>
<p>TI/2 States that development must be located and designed to reduce the need to travel, particularly by car, and promote sustainable travel appropriate to its location. Planning permission for development likely to give rise to increased traffic demands will only be granted where the site has or will attain sufficient integration and accessibility by walking, cycling or public and community transport. Larger developments (over 1 ha) are required to demonstrate that they have maximised opportunities for sustainable travel.</p>	<p>The operation of the PD will not attract significant amount of vehicle travels to/from the site. During the construction stage, a Construction Workers Travel Plan is proposed to reduce vehicle trips to the site and encourage the potential for flexible working patterns to facilitate travel outside the peak period. Therefore, the PD is compliant with the policy.</p> <p>The Transport Assessment and ES demonstrate the scheme does not generate a significant need to travel by car and promotes sustainable travel appropriate to the proposed location by proximity to alternative non-car means of travel and through the various management plans (CTMP, CWTP, OLTP, and OWTP). It sets out primary and secondary measures for improvements to public and community transport, as well as improved active travel for non-motorised users. These include: a new footway on the east side of Horningsea Road, segregated pedestrian/cycle access to the Proposed Development, provision of a new bridleway between the Gatehouse and Station Road, 30% of parking spaces to be for EV charging, and 50 cycle spaces. The number of cycle spaces will also rise from 50 post-occupation and will be developed in line with relevant cycle parking standards and increased demand. In supporting the application with a TA and Travel Plans, incorporating measures to protect and enhance the public rights of way network, and the delivery of new and improved sustainable active travel connections for non-motorised users including for equestrians appropriate to the scale and nature of the proposal, the Applicant considers the Proposed Development to be consistent with this emerging policy. The ES also demonstrates that</p>

	<p>there is adequate mitigation, including of cumulative impacts, on matters including noise, pollution, amenity, and health in the relevant chapters.</p>
<p>TI/3 Sets out indicative parking standards</p>	<p>Adopted SCLP Policy TI/3: Parking Provision includes a table at Figure 11 setting out Indicative Car Parking Provision standards for different use classes on a gross floor area basis.</p> <p>SCLP Policy TI/3 requires that car parking provision should be provided ‘through a designed approach in accordance with the indicative standards set out in Figure 11’. Other relevant criteria of Policy TI/3 state that car parking provision will ‘take into consideration the site location, type and mix of uses, car ownership levels, availability of local services, facilities and public transport, and highway and user safety issues, as well as ensuring appropriate parking for people with impaired mobility’ (criterion ii) and that all parking provision must be provided ‘in a manner that accords with SCLP Policy HQ/1 [Design Principles] and that the developer must provide clear justification for the level and type of parking proposed’ (criterion v). It is clear, therefore, that the parking provision figures presented in SCLP Figure 11 are not intended to be applied rigidly and are to be applied to different use classes on a gross floor area basis.</p> <p>The indicative parking standards set out in Table 11 of SCLP Policy TI/3 only apply to car parking. No standards are provided for HGVs, trailers, coaches or visitors and the reasonable presumption therefore is that these requirements are best assessed by the Applicant. In the case of the visitor and coach parking, the amount of spaces proposed reflects the Applicant’s assessment of need for visitors attending meetings on site and recognising the opportunity that the Discovery Centre will play in enabling people to understand and interact with water recycling processes and Anglian Water’s wider sustainability agenda, transparently showing what Anglian Water does while offering unique educational opportunities (see ES Chapter 11: Community [REP4-028]).</p>

	<p>Appropriate parking provision in this instance depends on the needs of staff to perform their function. Applying the anticipated employee/attendee numbers at the Proposed Development (as set out in Table 5-1 Operational Staff Numbers of ES Chapter 2 Project Description [REP4-022]) and the needs/reasoning for these personnel being on site as set out in the Applicant's response to ExQ2-20.11 [REP5-111] indicates a total maximum personnel on site at any one time of 56.</p> <p>Setting the maximum parameter for operational staff (including LGVs) at 56 parking spaces therefore represents a ratio of 1 space per employee which the Applicant considers is reasonable in the context of the indicative standards in SCLP Policy TI/3 to ensure sufficient spaces have been properly planned for and are provided to accommodate flexibility from fluctuations in activity and staff numbers and to avoid shortfall situations. The Operational Workers Travel Plan [REP4-070] will ensure that, as operational activity intensifies when the proposed WWTP reaches full capacity and particularly after 2041 when future increases in capacity are to be accommodated through, for example, the provisions of additional modules within the earth embankment, demand for these parking spaces (for example, through increased staff numbers) is effectively managed and there will not be a need to increase provision.</p> <p>Cycle parking will be provided for up to 50 cycles (the mixture of regular, cargo and EV cycles will be agreed as part of the Travel Plan) within the proposed WWTP; and provision of Electric Vehicle (EV) parking for up to 23 vehicles within the proposed WWTP on commencement of operation, with passive provision for a further 23 EV spaces implemented through the Travel Plan.</p> <p>Based on the above, the Applicant is of the opinion that the proposed parking provision is necessary and justified and is consistent with SCLP Policy TI/3.</p>
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<p>TI/8 Concerns infrastructure provision to make schemes acceptable in planning terms.</p>	<p>The Transport Assessment and ES demonstrate that impacts on highway safety and cumulative residual impacts on the road network would not be severe. The proposed access arrangements, and works on Horningsea Road, together with the new PRow and commitments secured through the management plans (CTMP, CWTP, OLTP, and OWTP) provide suitable arrangements for transport both during construction and operation as demonstrated in the TA and ES. The Proposed Development is, therefore, consistent with Policy TI/8.</p>
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Cambridge City Local Plan 2018

<p>Policy 1 : Concerning the presumption in favour of sustainable development</p>	<p>The PD accords with the presumption in favour of sustainable development as it will release a major previously developed site for housing development in a sustainable location.</p>
<p>Policy 2: Spatial strategy for the location of employment development</p>	<p>The PD will help release a large brown field site to support future employment development to deliver new jobs</p>
<p>Policy 3: Spatial strategy for the location of residential development</p>	<p>The PD aligns with the spatial strategy by helping release a large brown field site to develop around 8,000 homes at very sustainable location of Cambridge city.</p>
<p>Policy 4: The Cambridge Green Belt</p>	<p>There are very special circumstances to justify the PD in the Green Belt which are detailed in the Planning Statement.</p>
<p>Policy 5: Sustainable transport and infrastructure</p>	<p>The PD compliant with the policy by proposing a Construction Workers Travel plan to reduce vehicle trips to the site and encourage the potential for flexible working patterns to facilitate travel outside the peak period.</p> <p>So far as the Proposed Development only proposes the decommissioning of the existing WWTP within the City Council's area, it is considered to accord with the policy.</p>
<p>Policy 7: The River Cam</p>	<p>During operation, there would be impacts resulting from changes in final effluent and stormwater discharges which are expected to have a significant beneficial effect on water quality in the River Cam.</p>
<p>Policy 8: Setting of the city</p>	<p>The PD has been designed to preserve and enhance the character of the local area and to be appropriate in terms of scale and character of the setting of the city. The Design and Access Statement addresses these matters in more detail.</p>

Policy 15: Cambridge Northern Fringe East and new railway station Area of Major Change	The PD will release the existing site for the potential to be redeveloped which has been a policy objective for many years.
Policy 28: Carbon reduction, community energy networks, sustainable design and construction, and water use	<p>The PD complies with the policy as demonstrated in Design and Access Statement that the Proposed WWTP will be operationally carbon net zero, be energy neutral and will target a 70% reduction in capital carbon using sustainable construction techniques.</p> <p>The PD seeks to minimise the amount of water used in the treatment works.</p>
Policy 29: Renewable and low carbon energy generation	The operation of the PD will provide preferred option of gas to grid which supports renewable energy generation.
Policy 31: Integrated water management and the water cycle	<p>Appendix E of the Drainage Strategy comprises a drawing which provides an overview of the proposed drainage strategy.</p> <p>The proposed WWTP will be located in an excavated area and will be surrounded by a system of earth banks as part of the Landscape Masterplan. Therefore, it is expected that runoff flow from either surface water or groundwater sources will be contained within the perimeter of the proposed WWTP. Runoff within the proposed WWTP and access roads will be managed through the Drainage Strategy (Application Document Reference 5.4.20.12). Any potential change to surface water flood risk associated with the proposed WWTP is therefore considered to be mitigated by drainage design.</p>
Policy 32: Flood risk	The PD location has avoided flood risk areas and there will be no increased risk to flooding elsewhere.
Policy 33: Contaminated land	As set out in Land Quality chapter of the Environmental Statement (Chapter 14, App Doc Ref 5.2.14), the design of sub-surface structures is informed by surveys to understand ground conditions so that the design is appropriate to the conditions within the land required for the Proposed Development.
Policy 34: Light pollution control	Chapter 2 Project Description of the Environment Statement (Application Document Reference 5.2) sets out that there will be lighting implemented in relation to construction activities and the operation of the proposed WWTP. Chapter 15 Landscape and Visual of the

	<p>ES (Application Document Reference 5.2) sets out the effects of lighting arising from the Proposed Development.</p> <p>A Statement of Statutory Nuisance (Application Document Reference 7.13) has been prepared in respect of the Proposed Development. This concludes that based on the mitigation measures proposed in the Lighting Strategy, no nuisance is anticipated in respect of lighting of the Proposed Development during construction and operation.</p>
<p>Policy 35: Protection of human health and quality of life from noise and vibration</p>	<p>Potential impact on human health are considered at Chapter 12 of the Environment Statement. mitigation measures are also proposed in this chapter to avoid adverse health impact.</p> <p>As justified and concluded in the Noise and Vibration chapter of the Environmental Statement (Chapter 17, App Doc Ref 5.2.17), with the implementation of mitigation measures during construction, there will be no significant effects in respect of the Proposed Development. During operation, there would also be no significant effects in respect of noise and vibration. To this regard, it is considered that the Proposed Development is compliant with this policy.</p>
<p>Policy 36: Air quality, odour and dust</p>	<p>Air Quality of the Environment Statement (Application Document Reference 5.2) sets out the assessment and findings in respect of the Proposed Development and justifies that the PD would not lead to any breach in the air quality thresholds required by the policy.</p> <p>Odour impacts during the construction of the Proposed Developments are considered negligible and not significant. During normal operation, the results of the odour modelling reported in Chapter 18 Odour of the Environment Statement (Application Document Reference 5.2.18) conclude that impacts are not significant. During the unlikely periods of abnormal operation, taking into consideration the</p>

	secondary mitigation measures, the residual effect would be negligible and not significant. It is therefore considered that the Proposed Development is in accordance with this policy.
Policy 37: Cambridge Airport Public Safety Zone and Air Safeguarding Zones	The location of the proposed WWTP would not be within the ASZs and will not give rise to adverse impact on ASZs.
Policy 55: Responding to context	The PD has been designed to preserve and enhance the character of the local area and to be appropriate in terms of scale and the other relevant criteria in this policy. The Design and Access Statement addresses these matters in more detail.
Policy 69: Protection of sites of biodiversity and geodiversity importance	Chapter 8 Biodiversity of Environment Statement concludes that the Proposed Development would not have any significant effects following the implementation of mitigation measures. on sites of biodiversity and geodiversity importance.
Policy 70: Protection of priority species and habitats	Chapter 8 Biodiversity of Environment Statement concludes that the Proposed Development would not have any significant effects following the implementation of mitigation measures. on priority species and habitats.
Policy 81: Mitigating the transport impact of development	The Transport Assessment and ES assess the transport effects and identify appropriate mitigation where necessary to reduce adverse transport impacts to an acceptable level on the existing transport network and travel plans targeting behavioral change measures to encourage the use of sustainable modes of transport. So far as the Proposed Development only proposes the decommissioning of the existing WWTP within the City Council's area, it is considered to accord with the policy.
Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy	This policy requires that permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the new development. Where existing infrastructure will be placed under strain due to the impact of new development, improvements to existing infrastructure or compensatory provision should be made so that an appropriate level of infrastructure is maintained.

	Therefore, the policy supports the PD as it ensures after the redevelopment of the existing WWTP site there will be sufficient infrastructure capacity for the existing and any new developments in the wide Cambridge area.
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Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021

Policy 1: Sustainable Development and Climate Change	<p>The PD complies with the policy as demonstrated in Design and Access Statement that the Proposed WWTP will be operationally carbon net zero, be energy neutral and will target a 70% reduction in capital carbon against the DMO baseline using sustainable construction techniques. Progress against this target will be reported as per Design Code CAR.10.</p> <p>The PD seeks to minimise the amount of water used in the treatment works.</p> <p>The PD would also provide preferred option of gas to grid to support renewable energy regeneration.</p>
Policy 3: Waste Management needs	The information held within Policy 3 on the area's need for waste management capacity is considered for the baseline and potential impact of the Proposed Development on the forecasted future need.
Policy 4: Providing for waste management	ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [REP6-031] demonstrates the construction of the Proposed Development considers the waste hierarchy, prioritizing waste minimisation and recycling to contribute towards sustainable waste management- as required by the policy.
Policy 5: Mineral Safeguarding Areas	<p>As set out in the Land Quality chapter of the Environmental Statement (Chapter 14, App Doc Ref 5.2.14) Two Mineral Safeguarding Areas (MSA) are present within the study area related to the River Terrace Deposits and Chalk. This Chapter concludes that the Proposed Development does not have a significant effect on the MSA.</p> <p><u>The</u> (worst case) impact of the Proposed Development on mineral resources and to each MSA is negligible and the re-use and management of minerals extracted on site is secured through Requirement 9 of the draft DCO (App Doc Ref 2.1) [REP5-003]. The</p>

	<p>Applicant notes the County Council's support (in its response to ExQ1-15.10 - REP1-134) to the proposal to make use of excavated material within the project. The Applicant considers that the Proposed Development is, therefore, consistent with criterion (i) of Policy 5 which requires that the mineral can be extracted where practicable prior to development and, having regard to the extent of mineral resource affected, this quantity of affected material could not otherwise be economically extracted and would not prejudice future extraction of the mineral in the majority of the MSAs (noting Policy 5 criteria (j) and (k)). Criterion (l) is satisfied on the basis that complete prior extraction is not feasible and that should the ExA be of the mind that there is an overriding need for the development, MWLP Policy 5 would be satisfied.</p>
Policy 10: Waste management areas	<p>The Proposed Development has been screened to establish whether it is within a designated Waste Management Area, a designated area within the Local Plan whereby by waste management facilities are prioritised.</p>
Policy 11: Water Recycling Areas	<p>This policy supports proposals for relocation of water recycling centres where is required to meet wider growth identified in the development plan. The proposed development also meets the criteria set out in the policy.</p> <p>The first of these (Criterion (a)) is that there is a suitable watercourse to accept discharged treated water and there would be no unacceptable increase in the risk of flooding to others. In this case the suitable watercourse is the River Cam and the Proposed Development will discharge to the Cam, replacing the same arrangement in respect of the existing WWTP. This is addressed in ES Chapter 20 on Water Resources [REP6-039] and demonstrates that this water course is suitable to accept the discharged treated water. Paragraph 4.2.33 of ES Chapter 20 concludes that the impact of the final effluent discharge to water quality in the River Cam is minor beneficial. In respect of the risk of flooding to others, the Flood Risk Assessment shows that the proposed development will not act as a source of</p>

	<p>flooding, and that it poses no greater flood risk than the existing WWTP. As a result the Applicant considers that there will be no unacceptable increase in the risk of flooding to others for the purposes of the policy.</p> <p>Criterion (b) states that if a new site is less than 400m from existing buildings normally occupied by people then an odour assessment demonstrating that the proposal is acceptable will be required with appropriate mitigation measures. The site selection process for the Proposed Development included a 400m buffer zone around residential properties (Table 2.1 of REP2-011, 5.4.3.2 ES Volume 4 Chapter 3 Appendix 3.2 Stage 1 Site Selection Report – Initial Site Selection). There are, therefore, no existing buildings within 400m of the proposed WWTP. In addition, the ES includes at Chapter 18 Appendix 18.2 an Odour Impact Assessment [AS-203]. This document concludes at paragraph 6.1.4 that reasonable odour mitigation steps have been taken during design development so that the assessment concludes that the CWWTPR will have ‘Negligible’ odour impact to all known receptors. The operation of the proposed CWWTPR will be in compliance with the Odour Management Plan. This combined approach of ‘design’ and ‘active management’ assures ‘appropriate measures to minimise odour’ for the Project has and will continue to be taken. Therefore, the predicted residual effect of the odour impacts associated with the proposed Project would be “not significant”. The Proposed Development therefore complies with Criterion (b).</p> <p>Criterion (c) states that a new site should avoid land within flood zone 3 unless there is a clear and convincing justification not to do so, the proposal is supported by evidence of sustainability benefits, evaluation of site options and risk management through the application of the sequential and exception tests. The application is supported by a Flood Risk Assessment [REP6-084] which shows that the main treatment works site is located within Flood Zone 1. The ‘water compatible’ infrastructure (outfall, pipelines and tunnel) which would be located in Flood Zones 2 and 3</p>
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	<p>would not be considered to be at high risk from fluvial flooding, assuming the application of best practice construction methodology.</p> <p>In terms of Criterion (d) where adequate mitigation measures will need to address any unacceptable adverse environmental and amenity issues raised the proposal, the ES Non Technical Summary [REP6-007] sets out the summary of effects when mitigation measures are included at Section 4. This demonstrates that any unacceptable adverse environmental issues are addressed through the various mitigation measures proposed.</p> <p>The Applicant considers that the Proposed Development is compliant with the detailed criteria set out in MWLP Policy 11.</p>
Policy 14: Waste Management Needs Arising	<p>The policy is for the use of the Waste Management Guide Toolkit for the operation of non-waste developments (as stated paragraph 5.10 of the Mineral and Waste Local Plan 2021). As part of the assessment of operational waste impacts, that the proposed mitigation within ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [REP6-031] is considered to be appropriate and a Waste Management Guide Toolkit is not required.</p>
Policy 16 : Consultation Areas	<p>This policy requires within a CA which surrounds a WRA, and unless convincing evidence to the contrary is provided via an odour assessment report, there is a presumption against allowing development which would:</p> <p>(e) be buildings regularly occupied by people; or (f) be land which is set aside for regular community use (such as open space facilities designed to attract recreational users, but excluding, for example, habitat creation which is not designed to attract recreational users).</p> <p>Therefore, this policy is to prevent housing developments within the buffer zone of the existing WWTP. In order to eliminate the objection from the policy against redevelopment of the NEC area for housing, the PD to relocate the existing WWTP is the only way to do this.</p>

	<p>MWLP Policy 16 criterion (f) refers to land which is set aside for regular community use (such as open space facilities designed to attract recreational users, but excluding, for example, habitat creation). It is intended to provide public space to meet recreational needs from housing developments and thus would not apply to the Proposed Development. This is agreed in the response to the ExA's question by CCoC [REP5-118].</p>
Policy 17: Design	<p>The PD has been designed to preserve and enhance the character of the local area and to be appropriate in terms of scale and the other relevant criteria in this policy. The Design and Access Statement addresses these matters in more detail.</p>
Policy 18: Amenity Considerations	<p>The Environment Statement justifies that the proposed development will not give rise to adverse amenity harm from noise, odour and dust and other statutory nuisances.</p> <p>The Environment Statement concludes that with appropriate mitigation the proposed development will not give rise to unacceptable adverse amenity harm from noise, odour, dust and other statutory nuisances. Management plans such as the CWTP and OWTP set out mitigation measures to encourage modal shift to more sustainable travel, which would consequently result in a reduction in air quality, noise, and vibration effects.</p>
Policy 20: Biodiversity and Geodiversity	<p>Chapter 8 Biodiversity of Environment Statement concludes that the Proposed Development would not have any significant effects on biodiversity and geodiversity following the implementation of mitigation measures.</p>
Policy 21: The Historic Environment	<p>As set out in the Chapter 13 Historic Environment of Environment Statement, with the application of the primary, secondary and tertiary mitigation described in Landscape and visual amenity and within the LERMP (Application Document Reference 5.4.8.14), it is predicted that the level of harm on these heritage assets will be at the lower end of less than substantial harm.</p>

	<p>The substantial need for the Proposed Development and benefits set out in section 2 of the Planning Statement, it is considered that the harm to the heritage assets identified is outweighed by the public benefits and need for the relocation of the existing Cambridge WWTP.</p>
<p>Policy 22: Flood and Water Management</p>	<p>The PD location has avoided flood risk areas and there will be no increased risk to flooding elsewhere.</p> <p>Appendix E of the Drainage Strategy comprises a drawing which provides an overview of the proposed drainage strategy.</p> <p>The proposed WWTP will be located in an excavated area and will be surrounded by a system of earth banks as part of the Landscape Masterplan. Therefore, it is expected that runoff flow from either surface water or groundwater sources will be contained within the perimeter of the proposed WWTP. Runoff within the proposed WWTP and access roads will be managed through the Drainage Strategy (Application Document Reference 5.4.20.12). Any potential change to surface water flood risk associated with the proposed WWTP is therefore considered to be mitigated by drainage design.</p>
<p>Policy 23: Traffic, Highways and Rights of Way</p>	<p>Traffic and Transport of the Environment Statement (Application Document Reference 5.2.19) assesses the transport effects and provide mitigation where necessary to reduce adverse transport impacts to an acceptable level on the existing transport network.</p> <p>The Transport Assessment and ES demonstrate that impacts on highway safety and cumulative residual impacts on the road network would not be severe through application of appropriate mitigation including the management plans (CTMP, CWTP, OLTP, and OWTP) which promote sustainable travel modes and the commitment by the Applicant to achieve operational net zero. Safe and suitable access for all users of the PD can therefore be achieved. PROWS are being appropriately diverted and the PD includes the provision of a new bridleway and a new footway on the east side of Horningsea Road,</p>

	as well as the widening of the shared surface on the west side of Horningsea Road. A speed restriction and additional safe crossing point between Horningsea Road and Low Fen Drove Way are also proposed, contributing to road safety. All criteria of the policy are satisfied.
Policy 24: Sustainable Use of Soils	The reuse of material excavated during construction (primarily from tunnelling) would be managed through the application of CL:AIRE Definition of Waste: Development Industry Code of Practice (CL:AIRE, 2011, referenced in Chapter 14) for the reuse of excavated waste materials.
Policy 25: Aerodrome Safeguarding	The location of the proposed WWTP would be not within the ASZs, the application stie will go through the ASZs and the PD will not give rise to adverse impact on ASZs.

Policy Accordance Table B – Emerging Local Plans

Greater Cambridge Local Plan (Regulation 18: Preferred Options 2021)

Policies	Assessment
Policy S/JH: New Jobs and homes	The PD will release a major site for redevelopment which will help create of a new high quality mixed-use city district include new homes and commercial floorspace that will help support the Cambridge Cluster.
Policy S/DS: Development Strategy	The PD will release a major site for redevelopment for homes and employment spaces which will support the Cambridge Cluster
Policy S/SB: Settlement boundaries	The PD is located in the countryside and needs to be located in the countryside for a number of reasons including proximity to the River Cam and for odour mitigation purposes.
Policy S/NEC: North East Cambridge	The PD will release the existing site to be redeveloped which has been a policy objective for many years.
Policy S/NS: Existing new settlements	The PD will also provide supporting infrastructure for the Waterbeach New Town.
Policy CC/NZ: Net zero carbon new buildings	The PD complies with the policy as demonstrated in Design and Access Statement that the Proposed WWTP will be operationally carbon net zero, be energy neutral and will target a 70% reduction in capital carbon using sustainable construction techniques.
Policy CC/WE: Water efficiency in new developments	The PD seeks to minimise the amount of water used in the treatment works.

Policy CC/FM: Flooding and integrated water management	The PD location has avoided flood risk areas and there will be no increased risk to flooding elsewhere. The PD includes sustainable surface water drainage measures and has taken opportunities for enhancing biodiversity and amenity space as part of the scheme.
Policy CC/RE: Renewable energy projects and infrastructure	The PD includes renewable and low carbon energy generation in the form of anaerobic digestion.
Policy CC/CE: Reducing waste and supporting the circular economy	The PD complies with the policy as demonstrated in Design and Access Statement that the Proposed WWTP will be operationally carbon net zero, be energy neutral and will target a 70% reduction in capital carbon using sustainable construction techniques.
Policy CC/DC: Designing for a changing climate	The PD has considered climate change and has incorporated this into the design.
Policy CC/CE: Reducing waste and supporting the circular economy	The PD will use the operation waste to generate low carbon energy in the form of anaerobic digestion.
Policy BG/BG: Biodiversity and geodiversity	The PD will not adversely affect any sites of biodiversity or geological importance. The PD proposes a Biodiversity Net Gain of 20% and is therefore adding to biodiversity in accordance with the policy.
Policy BG/GI: Green infrastructure	The PD will not build on existing open space, sports or recreational land. Recreational connectivity is central to the PD design by providing connections to the existing PRoW and a new bridleway. Further mitigation measures proposed through Green Infrastructure are also set out at section 8.6 of the DAS.
Policy BG/RC: River corridors	During operation, there would be impacts resulting from changes in final effluent and stormwater discharges which are expected to have a significant beneficial effect on water quality in the River Cam.
Policy WS/HD: Creating healthy new developments	Potential impact on human health are considered at Chapter 12 of the Environment Statement.
Policy WS/IO: Creating inclusive employment and business developments	The PD will provide a Discovery Centre which will be used to educate the public and alluded to the efficient water consumption education.
Policy WS/HS: Pollution, health and safety	The PD will not give rise to adverse impact in relation to noise, contamination and odour and dust as justified in the Environment Statement.
Policy GP/PP: People and place responsive design	The PD has been designed to preserve and enhance the character of the local area and to be appropriate in terms of scale. The Design and Access Statement addresses these matters in more detail.

Policy GP/LC: Protection and enhancement of landscape character	<p>The construction and operation of the PD will give rise to some adverse impact on the Eastern Fen Edge Chalklands LCA and the River Cam Corridor LCA.</p> <p>The careful design and mitigation has been successful in minimising the visual impact of the Proposed Development where possible, such that only a relatively small number of receptors will experience long term effects. It is considered that the need and benefits case for the Proposed Development is set out at Section 2 of this PS in combination with the mitigation measures implemented through the landscape-led design, outweigh any effects arising from the Proposed Development.</p>
Policy GP/GB: Protection and enhancement of the Cambridge Green Belt	There are very special circumstances to justify the PD in the Green Belt which are detailed in the Planning Statement.
Policy GP/QD: Achieving high quality development	The PD has been designed to preserve and enhance the character of the local area and to be appropriate in terms of scale and the other relevant criteria in this policy. The Design and Access Statement addresses these matters in more detail.
Policy GP/QP: Establishing high quality landscape and public realm	the PD will adopt a multifunctional approach to deliver landscape enhancement, visual screening, ecological habitat creation and recreational opportunities for local communities.
Policy GP/HA: Conservation and enhancement of heritage assets	<p>As set out in Landscape and visual amenity and within the LERMP (Application Document Reference 5.4.8.14), it is predicted that the level of harm on these heritage assets will be at the lower end of less than substantial harm.</p> <p>The substantial need for the Proposed Development and benefits set out in section 2 of the Planning Statement, it is considered that the harm to the heritage assets identified is outweighed by the public benefits and need for the relocation of the existing Cambridge WWTP.</p>
Policy J/NE: New employment development proposals	The PD will release a major site adjacent to the Cambridge Science Park providing a mix of uses to support South Cambridgeshire and Cambridge as a world leader in research and technology based industries.
Policy J/AL: Protecting the best agricultural land	The sustainability considerations and need for the development are sufficient to outweigh the loss of the BMV land, please refer to the Site

	Selection Report (Application Document Reference 7.3) which sets out the justification for the preferred site selection.
Policy I/ST: Sustainable transport and connectivity	<p>The policy will correspond to SCLP Policies TI/2 and Cambridge LP Policies 5 and 81. The Transport Assessment and ES demonstrate the scheme does not generate a significant need to travel by car and promotes sustainable travel appropriate to the proposed location by proximity to alternative non-car means of travel and through the various management plans (CTMP, CWTP, OLTP, and OWTP). It sets out primary and secondary measures for improvements to public and community transport, as well as improved active travel for non-motorised users. These include: a new footway on the east side of Horningsea Road, segregated pedestrian/cycle access to the Proposed Development, provision of a new bridleway between the Gatehouse and Station Road, 30% of parking spaces to be for EV charging, and 50 cycle spaces. The number of cycle spaces will also rise from 50 post-occupation and will be developed in line with relevant cycle parking standards and increased demand. In supporting the application with a TA and Travel Plans, incorporating measures to protect and enhance the public rights of way network, and the delivery of new and improved sustainable active travel connections for non-motorised users including for equestrians appropriate to the scale and nature of the proposal, the Applicant considers the Proposed Development to be consistent with this emerging policy.</p>
Policy I/EV: Parking and electric vehicles	<p>Cycle parking will be provided for up to 50 cycles (the mixture of regular, cargo and EV cycles will be agreed as part of the Travel Plan) within the proposed WWTP; and provision of Electric Vehicle (EV) parking for up to 23 vehicles within the proposed WWTP on commencement of operation, with passive provision for a further 23 EV spaces implemented through the Travel Plan.</p>



Policy I/AD: Aviation development	The location of the proposed WWTP would be not within the ASZs, the application stie will go through the ASZs and the PD will not give rise to adverse impact on ASZs.

Proposed Submission North East Cambridge Area Action Plan Regulation 19 (November 2021)

The Emerging NECAAP policies are mainly aimed at the redevelopment proposals of the North East Cambridge Area, none of the policies are relevant to the relocation of the existing WWTP. However, as suggested on page 21 of the emerging Plan, the Area Action Plan is predicated on the relocation of the Waste Water Treatment Plant, and the outcome of the DCO process will be important in terms of confirming site availability and deliverability. Hence, to enable the continuing aspiration and opportunity which could be realised if the existing WWTP is relocated in the NCEAAP is the rational of the DCO.

Get in touch

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