

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Final Principal Areas of Disagreement

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PINS Project Reference: WW010003

Version 5  
April 2024

## Document Control

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## Version History

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description of change</b>
01	20/11/23		
02	05/12/23		Progress on Principal Ares of Disagreement as at Deadline 2
03	22/01/2024		Updated for Deadline 4
04	19/02/24		Updated for Deadline 5
05	12/04/24		Final document for Deadline 7

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# 1 Introduction

## 1.1 Background

- 1.1.1 The Applicant is proposing to build a modern, low carbon waste water treatment for Greater Cambridge on a new site area north of the A14 between Fen Ditton and Horningsea within the Cambridge drainage catchment area, to replace the plant on Cowley Road, hereafter referred to as the existing Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP).
- 1.1.2 A detailed description of the CWWTPRP can be found in Chapter 2 of the Environmental Statement (ES) (App Doc Ref 5.2.2) [APP-034].

## 2 Purpose of document

- 2.1.1 The Principal Areas of Disagreement (PAD) is submitted as part of an application by Anglian Water (“the Applicant”) for a Development Consent Order under the Planning Act 2008 (‘the Application’) for the CWWTPRP.
- 2.1.2 This PAD document relates to the Statement of Common Grounds (SoCGs) and highlights the areas which have not been agreed.
- 2.1.3 Whilst the Applicant has proactively engaged with stakeholders and stakeholders continue to co-operate, the PAD serves as a useful tracker and overview to the status of the final SoCGs and areas that remain disagreed at the time of this PAD version 5 and as of Deadline 7 (12 April 2024).
- 2.1.4 Further detail on the matters of disagreement is included in the Applicant’s protective provisions update in the Explanatory Memorandum (App. Doc. Ref 2.2 Rev 07) and the Applicant’s Closing Submissions (App. Doc. Ref. 8.33).

## 3 Structure of the PAD

- 3.1.1 To ensure consistency in the approach taken to documenting the matters of disagreement, Table 3.1 is presented to show areas of disagreement and the position for each area as follows:

	Matter not agreed
	Signed SoCG and final position agreed by both parties
	Unsigned SoCG

**Table 3.1: Summary of matters not agreed**

Stakeholder	Alternatives	Carbon	Development plan	Design and engineering	Environment Impact	Funding	Green Belt	Flood risk	Historic and heritage Environment	Landscape and Visual	Law and policy	Overall planning	Project need	Protective Provisions	Public Rights of Way	Recreational and visitors	Site access	Site selection	Traffic and transport
Cadent																			
Cambridge Water																			
Cambridge City Council																			
Cambridgeshire County Council																			
Emergency Services																			
Historic England																			
Natural England																			
National Highways																			
Network Rail																			
Save Honey Hill																			
GCP/SLC Rail																			
South Cambridgeshire District Council																			
The Cam Conservators																			
The Environment Agency																			
The National Trust																			
The Swaffham Internal Drainage Board																			
The Wildlife Trust																			
UKPN (Eastern Power Networks)																			
Waterbeach Development Company LLP																			
Waterbeach Internal Drainage Board																			

## 4 Summary of areas

**Table 4.1: Matters not agreed or under discussion at Deadline 7**

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
Cambridgeshire County Council	DCO Order Traffic and transport	All works within the adopted public highway be agreed with the Applicant using section 278 of The Highways Act 1980.	Discussions have continued between the Applicant and Cambridgeshire County Council to agree the Protective Provisions rather than requiring the use of a separate Section 278 agreement. These have been agreed except for one point as set out in the Protective Provision table in the Explanatory Memorandum (App Doc Ref 2.2 updated at Deadline 7).
The Conservators of the River Cam	Draft DCO	Powers required to deliver the project and how applied for within the DCO Disapplication of Byelaws within DCO and Protective Provisions sought for the protection of the Conservancy.  Protective Provisions sought and Article 44 of the dDCO.	The final position for the Applicant on Friday 12 April 2024, when the final DCO was submitted for approval, was that all aspects of the Protective Provisions were not agreed. The Applicant has therefore submitted with the DCO at Deadline 7 a version of the Protective Provisions proposed by the Applicant.  These provisions include the recovery of expenses for the discharge of the Conservator's functions and the processing of consents and monitoring.  Further detail on the matters of disagreement is included in the Applicant's protective provisions update in the Explanatory Memorandum (App. Doc. Ref 2.2 Rev 07) and the Applicant's Closing Submissions (App. Doc. Ref. 8.33).

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
The Environment Agency (EA)	Flood Risk Assessment	<p>The fluvial model provided to the Applicant dates from 2013 and that there have been no modifications to the model for the site-specific study.</p> <p>Following further modelling by the Applicant, the EA has advised that it has concerns that the modelling and FRA indicate there will be an increase in flood risk to third party land and properties downstream and has advised that a mitigation strategy must be included in the FRA.</p>	The updated FRA is not agreed and is under review by the Environment Agency.
The National Trust	Principal of Development and Green Belt Impact	The Trust's position on development in the Green Belt is that it must be carefully managed.	The Applicant set out in Section 6.2 of Planning Statement (App Doc Ref 7.5) the Very Special Circumstances case of the proposed development within the green belt, and defers to the process of determination for the Development Consent Order to conclude if very special circumstances have been demonstrated.
The National Trust	Landscape and Ecology	Whilst Trust agrees the assessment approach in the submitted LERMP (App Doc Ref 5.4.8.14) it considers the proposals should extend to the entire project area and not just the proposed WWTP.	The Applicant defers to the relevant authority to ensure the delivery of the LERMP is adequately secured within the Draft DCO.
The National Trust	Recreation and PRow	During pre-application discussions the 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.	The Applicant does not agreed that this is a suitable location for including this provision. The overall width of the bridge deck is insufficient to safely meet design requirements.

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
The Wildlife Trust	Site selection Biodiversity Hydrological impact Recreational pressure Draft DCO	As of 5 October 2023, the Wildlife Trust has requested the matters raised within the SoCG remain not agreed.	The Applicant and the Wildlife Trust have not agreed on any of the matters.
National Highways (NH)	Draft DCO (dDCO0)	Proposed Protective Provisions incorporated within the dDCO for the Protection of National Highways.	<p>The Applicant and National Highways have been able to agree protective provisions save for one paragraph.</p> <p>The Applicant and National Highways do not agree the wording in paragraph 19 of the SOCG [Ref: 7.14.17] headed 'Land or Rights' (and which is paragraph 20 of National Highways' standard protective provisions, also appended to the SOCG).</p>
Network Rail	Protective Provisions	The Protective Provisions sought by Network Rail have been the subject of ongoing discussion between the Parties legal representation.	<p>Network Rail and the Applicant have agreed a SOCG and a signed version will be submitted at Deadline 7. The parties have been unable to agree Protective Provisions in full but are continuing to negotiate a Framework Agreement in an attempt to resolve the points of difference.</p> <p>Further detail on the matters of disagreement is included in the Applicant's protective provisions update in the Explanatory Memorandum (App. Doc. Ref 2.2 Rev 07) and the Applicant's Closing Submissions (App. Doc. Ref. 8.33).</p>
Save Honey Hill Group (SHHG)	Law and Policy	The legal and policy framework for decision making.	The Applicant and SHHG have not agreed this matter.
Save Honey Hill Group	Need for the project	The need for relocation of the CWWTP.	The Applicant and SHHG have not agreed this matter.



Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
Save Honey Hill Group	Alternatives	The inadequacies in assessment of alternatives.	The Applicant and SHHG have not agreed this matter
Save Honey Hill Group	Development Plan	The application is contrary to policy in the NPPF, the adopted and emerging local plans.	The Applicant and SHHG have not agreed this matter.
Save Honey Hill Group	Green Belt	The impact of the proposal on the Green Belt.	The Applicant and SHHG have not agreed this matter.
Save Honey Hill Group	Design, Engineering and Landscape Concerns	The impact of the proposal on character and appearance, including design and landscape impact.	The Applicant and SHHG have not agreed this matter.
Save Honey Hill Group	Carbon	The carbon footprint of the Proposed Development.	The Applicant and SHHG have not agreed this matter.
Save Honey Hill Group	Environmental Effects, Mitigation and Harm	The environmental harm which will result from the development.	The Applicant and SHHG have not agreed this matter.
Save Honey Hill Group	Funding and Deliverability	The funding and deliverability of the Development Consent Order.	The Applicant and SHHG have not agreed this matter.
Save Honey Hill Group	Overall Planning Balance	The overall planning balance that the Examining Authority will be required to undertake.	The Applicant and SHHG have not agreed this matter.
Save Honey Hill Group	DCO Provisions	The content of the draft DCO and requirement.	The Applicant and SHHG have not agreed this matter.
South Cambridgeshire District Council (SCDC)	Historic Environment	SCDC do not agree with the impact assessment in respect of Biggin Abbey as a 'temporary minor adverse impact' (Historic Environment of the Environmental Statement, Paragraph 4.2.12:table 2.2 (App Doc Ref 5.2.13) [REP5-036]	The Applicant and SCDC have not agreed on the Level of Less than substantial harm.

Source: Individual Statements of Common Ground

## Get in touch

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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/>