

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 2 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.

<p>“Agreed” indicates where the issue has been resolved and is recorded in Green and marked Low</p>
<p>“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</p>
<p>“Not Agreed” indicates a final position and is recorded in Red and marked high</p>

- 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
- Very Special Circumstances
 - ii. Landscape) [REP5-062]
 - iii. Historic Environment [REP5-036]
 - iv. Carbon [REP5-032]
 - v. Ecology and Biodiversity [REP5-062]
 - vi. Land Quality and Contamination [REP5-038]
 - vii. Odour Impacts [REP5-044]
 - viii. Air Quality Impacts [REP5-026]
 - ix. Noise and Vibration [REP5-042]
 - x. Public Health [REP5-034]
 - xi. Community Impact [REP4-028]
 - xii. Public Rights of Way [AS-153]
 - xiii. Highways and Transportation [REP5-046]
 - xiv. Climate Resilience [REP5-030]
 - xv. 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 which agreement is sought.	AW Comments	SCDC Comments	Status
List of relevant policies	See Planning Statement [REP1-049] Appendix 5 for a list of the relevant Development Plan policies.	SCDC agrees with the list within the Applicant's Planning Statement [REP 1-049]	Low
Local Plan Policy Compliance Table	See Planning Statement – Local Policies Accordance Table [REP1-054].	The Local Polices accordance table [REP1-051]	Low
History of the North East Cambridge area	<p>The development potential of this area including the existing WWTP site has been identified for over 20 years in a series of development plans as part of the development strategy for the Cambridge area. It was first identified as a reserve of land for future growth and redevelopment in the Cambridgeshire Structure Plan 1989.</p> <p>This is a brownfield site on the edge of Cambridge which has not been delivered due to financial viability issues. The HIF funding that has been secured in 2019 overcomes this issue and the site is included in the emerging NECAAP and GCLP.</p> <p>The lengthy history of the North East Cambridge area is set out in the Applicant's response to ExQ1 2.10 [REP1-079] and in Section 2 of the Applicant's Planning Statement [REP1-049].</p>	<p>For over 20 years the existing CWWTP site and surrounding area has been promoted through consecutive statutory planning policy documents for redevelopment, to make the most of the Greater Cambridge area's sustained economic growth and, more recently, the significant investment in sustainable transport provision that serves the North East Cambridge area.</p> <p>As set out in the LIR (para 6.5), a document capturing the Chronology of the investigations into the feasibility of redevelopment of the Cambridge Waste Water Treatment Plant site (November 2021) [LIR Appendix 1, GCSP-18] is a supporting document for the emerging North East Cambridge Area Action Plan (see Emerging Development Plan Context section below). It shows the long history of consideration of the site of the existing plant and the surrounding underutilised brownfield area.</p>	Low

		<p>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.</p>	
<p>Extant Development Plan Context for the existing CWWTP site</p>	<p>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.</p> <p>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.</p> <p>These policies also state that the amount of development, 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.</p>	<p>The relevant policies in the extant development plans are South Cambridgeshire Local Plan 2018, Policy SS/4 and Figure 6 and Cambridge Local Plan 2018, Policy 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 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.</p>	<p>Low</p>
<p>Proposed Submission North East Cambridge Area Action Plan (NECAAP)</p>	<p>See Planning Statement [REP1-049] paragraphs 2.3.12 to 2.3.20.</p>	<p>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</p>	<p>Low</p>

	<p>The Proposed Submission AAP has been agreed by the Councils for future public consultation. Policy 1 of the AAP provides NEC for 8,350 new homes and 15,000 new jobs, of which 5,400 are on the existing WWTP site.</p>	<p>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.</p> <p>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 17-18).</p>	
<p>Emerging Greater Cambridge Local Plan (GCLP)</p>	<p>See Planning Statement [REP1-049] paragraphs 2.3.21 to 2.3.36.</p> <p>Policy S/NEC allocates NEC for housing and employment development which will form an important part of the development strategy for the Local Plan.</p> <p>Evidence supporting the GCLP is clear that the NEC site is the most sustainable location for strategic scale development available within Greater Cambridge.</p> <p>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 blocks of any future strategy for development” in the next GCLP Draft Plan (Regulation 18) consultation.</p>	<p>The emerging GCLP incorporates the proposals contained in the NECAAP through the proposed allocation of North East Cambridge within the spatial strategy for Greater Cambridge in the First Proposals (Reg 18) 2021 (proposed Policy S/NEC [LIR Appendix 1, GCSP-5 and Appendix 1, GCSP-5a], having tested the merits of the location as part of the process of identifying the preferred development strategy. The emerging GCLP and its supporting evidence show the highly sustainable locational merits of the NEC area for a new residential-led City district. The area proposed to be allocated in the emerging Greater Cambridge Local Plan is the same as that covered by the NECAAP.</p>	<p>Low</p>

		<p>The process tested a wide range of strategic locations through a range of evidence and concluded that NEC is the most sustainable location for development in Greater Cambridge. A Development Strategy Update in January 2023 confirmed that NEC should form a central building block for any future strategy for development for Greater Cambridge and was confirmed by the Councils for inclusion within the emerging GCLP. See LIR paras 6.50-6.63 and 6.72-6.77.</p> <p>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</p>	
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		<p>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 GCLP Timetable paragraphs 6-20).</p>	
<p>Implications of Water Supply, including for Plan timetables</p>	<p>See Planning Statement [REP1-049] paragraph 2.3.30 to 2.3.36.</p> <p>Water supply matters are also addressed in the Applicants response to EXQ1 21.58 [REP1-079]</p> <p>It is anticipated that, due to the timescales for the relocation of the existing WWTP into the early 2030s, the water supply situation will be resolved through measures being included within the Water Resource Management Plans (WRMPs) being prepared by Cambridge Water and Anglian Water. These include new water supplies via the Grafham Transfer and latterly the delivery of new reservoirs.</p> <p>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 new water supply infrastructure and nature-based solutions and a water credits system.</p>	<p>The LIR advised as follows: There remains uncertainty over the ultimate level of development that can be served with a sustainable water supply, it is anticipated that there should be a conclusion to the Water Resource Management Plan (WRMP) being prepared by Cambridge Water around the end of 2023. If there is a further delay, it is considered that a resolution is likely to be achieved by the end of the DCO examination process. Whilst there are delays to the emerging Local Plan process, it is not anticipated that the water supply situation would delay taking forward the Proposed Submission NECAAP following the conclusion of the DCO process. See LIR paras 6.64-6.71.</p> <p>An update on the water supply position is provided in the Written summary of Oral Submissions made at the Issue Specific Hearing 4 (ISH4) and responses to the Action Points Raised at Action Point 37. This sets out the acknowledged challenges in available water supply</p>	<p>Low</p>

	<p>https://www.gov.uk/government/publications/addressing-water-scarcity-in-greater-cambridge-update-on-government-measures/addressing-water-scarcity-in-greater-cambridge-update-on-government-measures</p>	<p>until the new water supply sources are available. It also sets out the range of measures being undertaken by Government to address this issue including through the Water Scarcity Group and commitment to £9 million funding.</p> <p>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.</p> <p>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.</p>	
<p>Extent to which housing needs could be met without the relocation of the CWWTP</p>	<p>See Planning Statement [REP1-049] Section 2.1 and the Applicant's comments on SCDC's LIR [REP3-054]. Very little of the total housing proposed in the NECAAP for the NEC area could be delivered with the retention of the existing WWTP. Development of this area would</p>	<p>If the DCO were not approved or if for any other reason the release of CWWTP does not occur, this would mean that the long-sought regeneration of North East Cambridge would remain undeliverable, and the local plans would be further delayed. The</p>	<p>Low</p>

	<p>largely be restricted to employment and commercial development. Few if any of the wider regeneration benefits for NEC 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, less sustainable locations would need to be identified by the Councils to deliver their spatial development strategy for homes and jobs as set out in the emerging GCLP. The delivery of a new low-carbon city district making a key contribution to the development of Cambridge, supporting growth in the economy and making an important contribution to meeting government housing objectives (the regional and national significance of which has been recognised in the SoS's s.35 direction of 18 January 2021 and its importance elevated by the 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.</p>	<p>Councils would therefore necessarily have to go back through the process of considering the available broad locations for development that performed next best against the guiding principles. There would be a need to identify and allocate other strategic scale site(s) within Greater Cambridge to meet the area's need for housing and employment, so far as is possible within infrastructure constraints, including water supply and housing deliverability considerations. on the basis of the evidence available to the District Council at this time, the alternative locations to North East Cambridge that could be available to meet the Councils development needs are all less sustainable in transport terms and the carbon emissions arising. it is not the Councils' position that active alternatives to the North East Cambridge scheme have been or are being identified. See LIR paras 6.78-6.82.</p>	
Progressing the emerging Development Plans			
<p>Housing Trajectory on the CWWTP site in the emerging NECAAP and Local Plan</p>	<p>The draft NECAAP makes provision for the NEC to accommodate 8,350 new homes, 15,000 new jobs, and the provision of various community, cultural, and open space facilities in NEC. Of the 8,350 new homes, approximately 5,400 are expected to be delivered on the existing CWWTP site.</p>	<p>The housing trajectory in the Proposed Submission draft of the NECAAP indicates 1,900 homes coming forward on the Applicant and City Council owned land over the plan period 2020 – 2041, out of a total of 5,500 homes on that land. All these homes are on land enabled by the relocation of the CWWTP. The housing trajectory in the emerging GCLP follows the approach in the NECAAP. See LIR paras 6.84-6.89.</p>	<p>Low</p>

<p>Degree of certainty that the NECAAP and emerging Local Plan would be found sound and adopted and timescales for this</p>	<p>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.</p>	<p>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.</p>	<p>Low</p>
<p>Degree of certainty for redevelopment of existing CWWTP site</p>	<p>See Planning Statement [REP1-049] paragraph 2.3.12 to 2.3.36. There is high certainty that the existing WWTP site is suitable for housing development. Its future use for housing is secured through the Homes England HIF agreement. The 'NECAAP - Chronology of the feasibility investigations of redevelopment of the Cambridge Waste Water Treatment Plant' Report (July 2021) lists studies dating back to 1989 into feasibility of the redevelopment of the existing site. Studies in support of the Reg.19 version of the NECAAP have specifically 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+1 / 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.</p>	<p>The Applicant and the City Council have appointed a master-developer to bring forward a planning application for redevelopment of the existing CWWTP site. The Greater Cambridge Shared Planning Service has recently commenced preapplication discussions with the master-developer team and a Planning Performance Agreement has been entered into. Members of both Councils have continued to reiterate their clear desire to see the regeneration of the NEC area. See LIR paras 6.95-6.97.</p>	<p>Low</p>

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

	<p>identify alternative less sustainable sites to accommodate the homes which could not otherwise be delivered within NEC.</p>		
<p>Relationship between the ReWWTP DCO and the emerging development plans</p>	<p>The progression of both the North East Cambridge Area Action Plan (NECAAP) and Greater Cambridge Local Plan (GCLP) are dependent on the WWTP being approved for relocation.</p> <p>See Planning Statement [REP1-049] paragraphs 2.3.12 to 2.3.36.</p>	<p>The Council considers there is an interdependence between this DCO application process and the development plan process in so far as that process relates to the proposed redevelopment of the site of the existing Cambridge Waste Water Treatment Plant (CWWTP) and the surrounding area. The emerging North East Cambridge Area Action Plan (NECAAP) and Greater Cambridge Local Plan (GCLP) are predicated on the relocation of the WWTP and can therefore only progress to Reg 19 consultation once there is evidence to demonstrate that the site is deliverable. The HIF provides evidence that the relocation is now viable after many years where this has not been the case. If the DCO is approved, it will provide evidence that the relocation can take place to a suitable alternative site. In turn, the emerging NECAAP and GCLP provide evidence to the DCO process of the significant planning benefits that relocation of the WWTP will enable to be delivered. See LIR paras 6.1, 6.36, 6.72 – 6.77 and 6.102 – 6.106.</p>	<p>Low</p>
<p>Weight to be given to emerging development plans and how the Examining Authority should avoid prejudicing the outcome of the emerging Local Plan and AAP examinations when attributing weight to those documents</p>	<p>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.</p> <p>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 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</p>	<p>While the Councils appreciate that the Proposed Submission draft of the NECAAP carries 'limited' weight in the determination of new planning applications under the Town and Country Planning Act 1990 coming forward within the NEC area, the Councils are of the opinion that the draft NECAAP can be given considerable weight as a matter that is both important and relevant to the DCO application. In particular, the draft AAP is being prepared in accordance with the adopted 2018 Local Plans policies, in that it establishes the "amount of development, site</p>	<p>Low</p>

	<p>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 (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 (Regulation 18) consultation. This identification of the NEC does not therefore prejudice the outcome of the emerging local plans.</p>	<p>capacity, viability, timescales and phasing of development" as required of the preparation of an Area Action Plan for the site within the extant Local Plan policies. In this context, the AAP is less about the principle of redevelopment and more about consideration of the amount and type of development that could be realised should relocation of the CWWTP take place. Such considerations are informed by evidence base studies, community engagement, and responses to consultation. With respect to the emerging GCLP, the evidence supporting the local plan considers the locational merits of the NEC area against all other reasonable options and concludes it is the most sustainable location in Greater Cambridge for housing and employment development. See LIR para 6.107-6.110.</p>	
<p>Significance of North East Cambridge to the Cambridge Economy</p>	<p>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</p>	<p>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.</p>	<p>Low</p>

	<p>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.</p> <p>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].</p>		
<p>Government's Cambridge 2040 initiative</p>	<p>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 '<i>to accelerate the relocation of water treatment works in Northeast Cambridge (subject to planning permission)...</i>' .</p> <p>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.</p> <p>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].</p>	<p>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.</p> <p>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 as one of three key strategic sites that the 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).</p>	<p>Low</p>

Benefits arising from vacation of the existing WWTP site	A number of benefits will be enabled. See Section 4.2 and Table 4.3 below, and Planning Statement [REP1-049] Sections 2.1 and 2.2.	There is clear evidence through the emerging plan making processes in respect of the NECAAP and GCLP 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.	Low
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4.2 Benefits of the DCO Application and Project

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

Statement/document on which agreement is sought.	AW Comments	SCDC Comment	Status
Planning Benefits	<p>Decommissioning and release of the existing WWTP site will enable regeneration and the creation of a new district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) on a brownfield site within the urban area of Cambridge.</p> <p>Specifically, relocation will create the opportunity for a 42 hectares brownfield site for redevelopment and release a further 35 hectares of land currently constrained to general industrial and office use on an area of land forming the gateway between Cambridge North station and the Cambridge Science Park which is identified in the Regulation 19 version of the North East Cambridge Area Action Plan (NECAAP) as having the potential to provide: On the existing WWTP site -</p> <ul style="list-style-type: none"> • 5,500 new homes • 23,500 m2 new business space • 13,600 m2 new shops local services, community, indoor sports and cultural facilities • 2 primary schools and early years centres and land safeguarded for 1 additional primary school if needed (and space set aside for a secondary school if needed) 	<p>The Council recognises there are substantial planning benefits that would arise as a consequence of the development proposal, benefits that have been identified for over 20 years in Regional, Structure and Local Plans, but that have not been able to be delivered due to viability constraints. The HIF funding provides a once in a generation opportunity to address the viability issue that has prevented regeneration for decades. There is very little potential for regeneration of the CWWTP site and surrounding area of North East Cambridge Area without the relocation of the CWWTP. The District Council considers the planning benefits that would arise to be as set out in its LIR and as summarised at paras 6.116-6.119 but include the following:</p> <p>The release of the existing CWWTP site will underpin the delivery of 8,350 homes. This is demonstrated by the evidence in support of the Draft Proposed Submission NECAAP (Regulation 19) which shows the potential</p>	Low

	<p>On the surrounding area -</p> <ul style="list-style-type: none"> • 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) <p>Partial retention of existing commercial floorspace</p>	<p>for the existing CWWTP site, once vacated together with neighbouring City Council owned land to accommodate c.5,500 net new homes, and by removing environmental constraints, to enable up to a further c.2,850 net new homes on surrounding sites.</p> <p>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</p>	
Environmental Benefits	<p>Environmental benefits through the delivery of a new modern, low carbon waste water treatment facility:</p> <ul style="list-style-type: none"> • 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) 	<p>South Cambridgeshire District Council recognises the significant environmental benefits arising as a result of the proposed development including:</p> <ul style="list-style-type: none"> • 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 	Low

	<p>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.</p>	<p>the most sustainable location in Greater Cambridge for development.</p> <ul style="list-style-type: none"> 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	<p>Social benefits through:</p> <ul style="list-style-type: none"> 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) <p>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.</p>	<p>The District Council recognises the social benefits arising as a result of the proposed development including:</p> <ul style="list-style-type: none"> 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	<p>Economic benefits through:</p> <ul style="list-style-type: none"> 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 	<p>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.</p>	Low

	<p>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 2023 to ‘supercharge’ Cambridge as Europe’s science capital.</p>		
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4.3 Green Belt

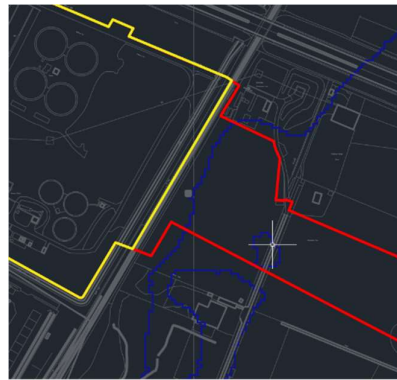
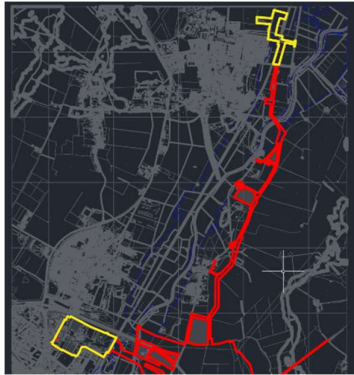
Table 4.3: Details of the summary and status of agreement on Green Belt

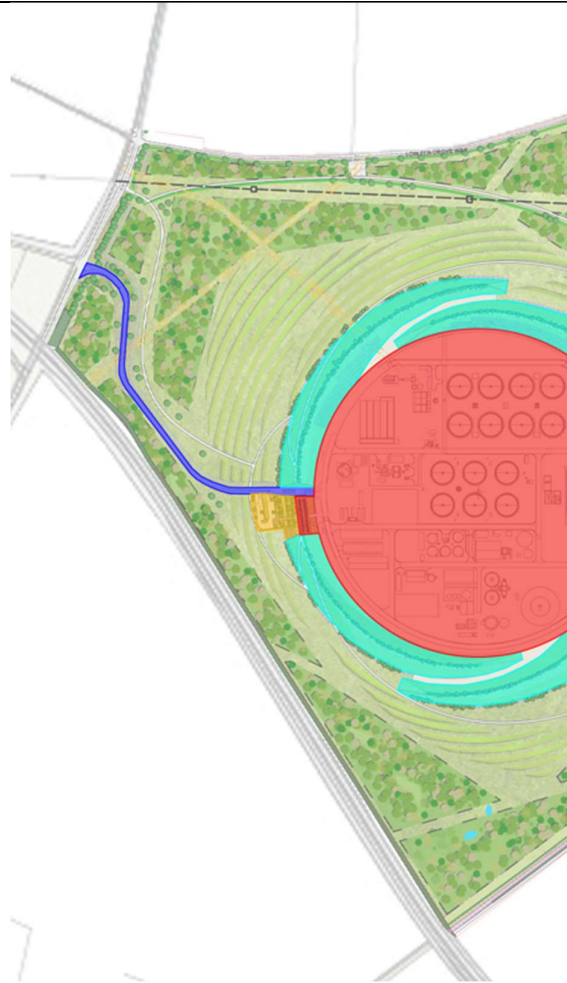
Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<p>Planning Statement: Green Belt Assessment (App Doc Ref 7.5.3).</p>	<p>The Green Belt policy situation is set out in the Planning Statement (App Doc Ref 7.5). The policy requirement on Green Belt is as set out at Section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

	<p>decision maker to resist inappropriate development in the Green Belt except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p>		
<p>Compliance with National and Local Policy</p>	<p>The Green Belt purposes as set out in the NPPF are:</p> <ol style="list-style-type: none"> to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land <p>Paragraph 2.30 of the adopted South Cambridgeshire Local Plan sets out the particular purposes of the Cambridge Green Belt:</p> <ul style="list-style-type: none"> Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre; Maintain and enhance the quality of its setting; and Prevent communities in the environs of Cambridge from merging into one another and with the city. <p>Policies 4 and S/4 respectively of the adopted Cambridge and South Cambridgeshire Local Plans do not allow inappropriate development unless very special circumstances can be demonstrated. However, they do allow for appropriate development including engineering operations.</p>	<p>SCDC's position in respect of policy compliance is set out in our LIR.</p> <p>South Cambridgeshire Local Plan Policy NH/8: Mitigating the Impact of Development in and Adjoining the Green Belt relates to development that is both appropriate and inappropriate. When considering inappropriate development (which the proposal is) the approach adopted is that required under the NPPF and as reflected in South Cambridgeshire Local Plan Policy S4 (see below). SCDC considers that this policy is relevant to the exercise of the assessment of harm arising which would then be weighed against any findings of very special circumstances and whether they are sufficient to outweigh the harm to the Green Belt harm.</p> <p>South Cambridgeshire Local Plan Policy S/4: Cambridge Green Belt is relevant to this proposal. Policy S/4 sets out that a Green Belt will be maintained around Cambridge defining the extent of the urban area as shown on the Policies Map. It confirms that new development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework.</p> <p>Para 7.19 of the SCDC LIR [REP5-120] that <i>"The proposal would have an adverse effect on the rural character and openness of the Green Belt"</i></p>	<p>Low</p>

	<p>In accordance paragraphs 149 and 150 of the NPPF, the proposed woodland, hedgerows, tree planting, meadows and recreational routes shown on the landscape masterplan (within the LERMP Application Document Reference 5.4.8.14) do not comprise development and are not be considered to be inappropriate development. In addition, the following works are not considered to be inappropriate development within the Green Belt:</p> <ul style="list-style-type: none"> • The pipeline and connection infrastructure • The discharging point substantially underground • Access road (and small surface level car park) <p>The proposed WWTP and surrounding earth bank (as a substantial structure in its own right) do not fall within the exceptions set out at NPPF paragraphs 149 and 150 and must, accordingly, be considered to be inappropriate development.</p> <p>The total area of land contained within the Draft Order Limits is 209 hectares. The land at Milton west of the railway line and at Waterbeach 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:</p> <ul style="list-style-type: none"> • 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 	<p>To that degree the proposal conflicts with NH/8 however it is for the ExA to make the final determination which weighs harm against any finding that very special circumstances exist.</p> <p>As noted below SCDC does consider that there are significant benefits as detailed in the SCDC LIR [REP 5-120] that <u>could</u> amount to very special circumstances.</p> <p>If the determination is made that there are very special circumstances, then SCDC consider that Policy NH/8 could be treated as complied with subject to the mitigation as set out by the Applicant.</p> <p>SCDC would reiterate the point that if this proposal was an application under the TCPA 1990 it would be for the County Council to make this assessment and decision.</p>	
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- Remainder (for engineer works, pipeline, compounds, landscaping) 129.4
Total 160.9ha





Note: The habitat drawing in the DAS (App Doc Ref 7.6) shows gaps in earth bank as part of the area of calcareous grassland being primarily for ventilation.

4.3.1 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 be given to them) are:

Harms	Comment	AW Weight	SCDC Comments
Water Quality, Resources and Flood Risk	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Temporary harm on habitats (4.6.16) 	Moderate	Weighting is not for SCDC as an interested party but for the ExA.
Landscape and Visual Amenity	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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)	<ul style="list-style-type: none"> The Proposal Development is inappropriate development in the Green Belt, which is harmful by definition (4.8.38). In addition, there would be: <ul style="list-style-type: none"> Harm to the openness of the Green Belt - Moderate (4.8.41) Harm to the purposes of including land in the Green Belt – Moderate (4.8.41) 	Substantial	Weighting is not for SCDC as an interested party but for the ExA.
Designated Heritage Assets	<ul style="list-style-type: none"> 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.

	<ul style="list-style-type: none"> Harm from the partial or complete removal of archaeological remains 		
Non-designated Heritage Assets (4.10.20)	<ul style="list-style-type: none"> Indirect harm to non-designated heritage assets (4.10.20) 	Less than Substantial	Weighting is not for SCDC as an interested party but for the ExA .
Socio Economic	<ul style="list-style-type: none"> 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 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	<p>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.</p> <p>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)</p> <p>Supporting forms of sustainable development</p>	Substantial	Weighting is not for SCDC as an interested party but for the ExA.

Socio Economic	<p>Direct economic benefits of the CWWTPR development supporting a prosperous economy (4.13.7).</p> <p>Maximising public value and supporting the circular economy (2.2.17), including encouraging the optimum use of public transport and green travel infrastructure.</p> <p>Enhancing education (2.2.17 and 4.13.13).</p> <p>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).</p> <p>Indirect social benefits from the delivery of new schools, jobs, local services, community and other facilities and increased access to green spaces.</p>	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 agreement is sought.	AW Comments	SCDC Comments	Status
<p>Assessment Approach</p> <p>The assessment presented in ES Chapter 8 Biodiversity App Doc Ref 5.2.8 [REP2-007] including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>	Agreed.	SCDC is satisfied with the biodiversity methodology as set out in the Biodiversity Chapter of the ES [REP2-007]	Low

<p>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.</p>	<p>Agreed</p>	<p>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]</p>	<p>Low</p>
<p>River Units</p>	<p>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].</p> <p>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.</p>	<p>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.</p> <p>It is now agreed that this is appropriate to secure the delivery of the River Units</p>	<p>Low</p>
<p>Protected Species</p>	<p>It agreed that <u>Paragraph 7.2.26 replaced with the following two paragraphs;</u> All mitigation bat boxes installed in line with the approved Natural England licence will be monitored and managed as per agreed licence conditions. Currently (as detailed within the draft licence (5.4.8.20 ES Volume 4 Appendix 8.20 Bat Natural England Ghost Licence Method Statement) this mitigative provision is considered to be a bat box installed for each roost impacted by proposals (impacts relate to disturbance only), to be appropriately installed within proximity to the roost impacted, with annual monitoring for five years through visual inspection. The Habitat Management and Monitoring Plan to be produced, alongside the approved Natural England licence, will include any changes to mitigation and compensation provision (and the monitoring and management as necessary) as informed by pre-commencement surveys.</p>	<p>Low</p>	

	<p>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.</p>	
<p>Habitat Management and Monitoring Plan</p>	<p>The following wording is now agreed</p> <p>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).</p> <p>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.</p> <p>Reinstatement planting to reestablish habitats will be undertaken in the first available planting season following construction. Species mixes will match the existing habitat.</p> <p>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.</p> <p>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 Management and Monitoring Plan will include a method statement for the habitat reinstatement works, habitat</p>	<p>Low</p>

	<p>reinstatement monitoring programme and scope of the habitat reinstatement monitoring programme (i.e. surveying UK Habitat condition, timeframe for each habitat meeting target condition).</p>	
<p>Invasive Non Native Species</p>	<p>The Applicant and SCDC have agreed the following wording will be included to the Outfall Management Plan [REP4-060] Section 5</p> <p>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.</p> <p><u>Code of Construction Practice Part B</u> Page 9</p> <p>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 dams 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 the Countryside and Wildlife Act 1981 (as amended).</p> <p>Part A 7.2.9 Add Invasive species to the list of toolbox talks. 7.2.60 “any contaminated areas will be marked out with appropriate fencing along with associate signage to prevent site staff from entering the contaminated area. Site staff will receive training as part of the ‘toolbox talks’ to enable them to identify invasive species including floating pennywort and</p>	<p>Low</p>

	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;”	
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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.

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

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

	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
Mitigation The 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 sought.	AW Comments	SCDC Comments	Status
<p>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.</p>	<p>Agreed</p>	<p>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.</p>	<p>Low</p>
<p>The inclusion and approach adopted by the CLP (App Doc Ref 7.8) [REP4-078] is agreed.</p>	<p>Agreed</p>	<p>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.</p>	<p>Low</p>
<p>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.</p>	<p>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.</p> <p>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</p>	<p>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).</p> <p>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.</p>	<p>Low</p>

	<p>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).</p> <p>This is agreed with National Highways, CoCC and the Horningsea Greenway Project team.</p>		
<p>Recreational Use</p> <p>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.</p>	<p>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.</p> <p>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.</p>	<p>The District Council does not have any objection to this approach.</p>	<p>Low</p>
<p>Requirements</p>	<p>The Applicant has set out in its proposals for the provision of cycle parking and</p>	<p>The District Council recommends that cycle parking at the new facility would need to be</p>	<p>Low</p>

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

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

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 SCDC seek further clarity on the acceptance of the range of stakeholder	Review Consultation summary report and Community Liaison Plan and/or discuss further	The previous engagement with this hard to reach group and the future engagement has discussed the future engagement with both SCDC and CoCC and	Low

<p>consulted as part of the consultation process particularly in relation to the Gypsy, Roma, Traveller community.</p>		<p>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.</p> <p>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.</p> <p>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.</p>	
<p>Traffic Monitoring SCDC will continue to review at the discharge of requirements if adequate provision within 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.</p>	<p>For further review at the discharge of requirements stage.</p>	<p>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.</p>	<p>Medium</p>
<p>Health and Wellbeing The assessment approach and methodology presented within the Health Mental Wellbeing Impact</p>		<p>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).</p>	<p>Low</p>

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 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].

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

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
The collation of available heritage data, archaeology and built heritage surveys, setting assessments and geophysical surveys are adequate.	Agreed	SCDC is satisfied with the collation of available heritage data archaeology and built heritage surveys, setting assessments and geophysical surveys are adequate as set out in REP1-023.	Low
The proposed approach to assessing impact upon the historic environment/heritage assets and the historic characterisation exercise and the Archaeological Investigation Strategy is appropriate.	Agreed	The Environmental Statement [Historic Environment Chapter of the ES [REP1-023] identifies a range of impacts on the identified built heritage and historic landscape assets from both temporary and permanent construction. The District Council agrees with the methodology that has been used for the assessment of heritage assets.	Low
The lighting strategy proposed as part of the Environmental Statement is appropriate to mitigate the visual impact on heritage assets.	Agreed	TBC	Low
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

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

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]

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

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

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

<p>data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>		<p>the assumption that the offensiveness of the odour is considered “moderately offensive” rather than “highly offensive”. This is on the basis of 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.</p> <p>SCDC do not disagree with the methodology or mitigation measures</p>	
<p>Mitigation</p>		<p>Construction Mitigation</p> <p>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 project's development.</p> <p>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.</p> <p>Operational Mitigation</p> <p>The District Council notes that the Applicant has designed / scoped out as much odour as possible, and it is assumed that the site will</p>	<p>Low</p>

		have BPM (best practicable means) as part of their environmental permit.	
Requirements		<p>The following requirements should be considered as part of the DCO to protect and safeguard the amenities of the surrounding community.</p> <ul style="list-style-type: none"> • Outline Commissioning Plan • Odour modelling / further information would be beneficial to consider concentrated influent. • More detail on water, climate change 	Low

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 summary and status of agreement on Lighting.

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<p>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.</p>	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 entering the building, which is an important design	Medium

		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 9 of the draft DCO (App Doc Ref 2.1) [REP5-003].

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 assessment presented in Environmental Statement Volume 2 Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [REP5-042]. including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.	The Approach has been agreed within Technical Working Groups.	The District Council is generally satisfied with the scope, methodology and conclusions derived from the Noise and Vibration Chapter (Chapter 15) of the ES [Doc ref.5.2.17] [REP5-042]. The District Council notes that the CEMP makes reference to S.61 consent being sought which should be clarified owing to the potential dual regulation through both the planning and environmental health	Low

<p>Assessment conclusion 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]</p>	<p>Agreed</p>	<p>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.</p>	<p>Low</p>
<p>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.</p>	<p>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</p>	<p>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.</p>	<p>Low</p>
<p>Mitigation</p>		<p>The District Council notes that some of the proposed mitigation measures are 'embedded' in the design of the proposed development. For example, it is advised that the adjustment of Order Limits to avoid sensitive features, amending the sizing and location of temporary access routes and compounds has allowed for noise</p>	<p>Low</p>

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

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].

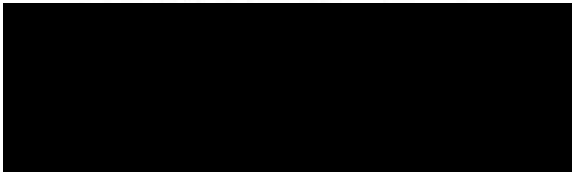
Table 4.3: Details of the summary and status of agreement on development plan for Waterbeach New Station

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

Agreement on this SoCG

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

Name: Mark Malcolm

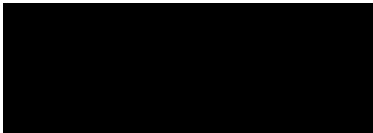
Signature: 

Position: Programme Director Major Infrastructure

On behalf of: Anglian Water Services Limited

Date: 11.04.2024

Name: Heather Jones

Signature: 

Position: Deputy Director Planning and Building Quality

On behalf of: South Cambridgeshire District Council

Date: 11.04.2024

Appendix 1 Summary of Pre-Application engagement.

Matter	Record of agreement
Engagement Process	
The parties accept the need for pre-application engagement to minimise risk of abortive or unnecessary pre-application submission work or the need for additional assessment post application submission and are willing to attend TWGs when available and one to one meetings, if needed.	TWG 11 March 2021
Agriculture and Soil Resources	
The Applicant and SCDC agree the need for and the proposed scope of the Agricultural Land Classification and Soil Management Plan and the adequacy of the Land Quality Assessment, Guidance to be followed in assessments to include; land contamination, sensitivity criteria and magnitude of impact.	Biodiversity TWG dated 26 April 2022
The Applicant and SCDC agree the mitigation measures proposed in the CoCP to ensure works do not cause contamination of soils or impact upon human health.	Environmental Health TWG dated 29 April 2022
Air Quality	
The Applicant and SCDC agree the methodology applied to the Air Quality Assessments, the guidance to be followed in assessments and maximum design scenarios and assessment criteria.	Environmental Health TWG 29 April 2022. [email Kathryn Taylor to Officers 29 April 2022 and follow up e mail dated [24/06/22]
Biodiversity	
The Applicant and SCDC agree the approach to the EIA, the proposed Species for detailed ecology surveys for 2021 and scoping assessment, the potential impacts to statutory designated sites and the potential impact to non-statutory designated sites.	TWG meeting 11 June 2021
The Applicant and SCDC agree the methodology and assessments used for the EIA in advance of submission of the EIA scoping report	TWG 18 August 2021
The Applicant and SCDC agree Proposed approach to the PEIR and topics for the Environmental Information Papers	TWG 18 November 2021
The Applicant and SCDC agree what was presented at Consultation Phase 3 and mitigation summary presented in the Preliminary Environmental Information Report and LERMP.	TWG 3 February 2022
The Applicant and SCDC agree that Biodiversity Metric 3.0 will be used to calculate and evidence the Biodiversity Net Gain (“BNG”) requirements for the project. It is also agreed that the Applicant will share the full details of the calculations including annotative drawings showing the classification, condition and size of each parcel of land for SCDC to assess and comment upon.	TWG 3 February 2022

The Applicant and SCDC agree the commitment to maintain BNG habitats for a minimum of 30 years and accept the Biodiversity Assessment scope. The Applicant and SCDC agree that a minimum of 20% BNG will be delivered by the project.	TWG 26 April 2022.
The Applicant and SCDC agree the mitigation proposals for water voles and badgers and the management through Natural England Licences. the Wildlife Management Plan.	Workshop meeting 14 June 2022.
Carbon	
The Applicant and SCDC agree the assessment of Carbon presented within the PEIR and how it has been addressed at decommissioning and the wider carbon implications of the project and the link to the North 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.	Workshop 15 June 2022
The Applicant and SCDC agree the LERMP responds to the guidelines in the Greater Cambridge Landscape Character Assessment (2021).	

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 and proposed Community papers.	TWG 1 February 2022
The Applicant and SCDC agree the guidance to be followed in noise and vibration assessments, maximum design scenarios, assessment criteria, significance construction and operational noise and proposal for Environmental Statement. The Applicant and SCDC agree the tunnelling and pipeline impacts and assessments and the need for Community Liaison Officer.	Environmental Health TWG 29 April 2022. [email Kathryn Taylor to Officers 29 April 2022 and follow up e mail dated 24 June 2022]

Odour

The Applicant and SCDC agree the Odour Assessment to be undertaken in accordance with best practice guidance IAQM's <i>Guidance on the assessment of odour for planning</i> Version 1.1 – July 2018, Emission rates – as measured at existing WWTW for comparable processes or UK Water Industry Research (UKWIR) Odour Control in Wastewater Treatment emission rates, Mitigation measures considered in line with the NPS Statement for Waste Water and that the objective will be “Negligible” impact at receptors (as defined in IAQM's guidance)	TWG 12 May 2021
The Applicant and SCDC agree the assessment methodology for the odour management plan, the guidance to be followed in assessments and the mitigation measures relevant to Odour. Maximum design scenarios and qualitative assessment.	Environmental Health TWG 29 April 2022. [email Kathryn Taylor to Officers 29 April 2022 and follow up email dated [24 June 2022]

PROW

The Applicant and SCD agree that there is unlikely to be an increased impact of anti-social behaviour as a result of the project and the Environmental Assessment that anti-social behaviour is likely to diminish.	PRoW TWG 23 June 2022
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Recreation

The Applicant and SCDC agree the scope and assessments undertaken to inform the Landscape, Ecological and Recreational Management Plan (LERMP) and the measures set out in the CoCP and CTMP.	(scope and assessments agreed but topic remains under discussion)
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Traffic and Access

The Applicant and SCDC agree the approach and structure of the Traffic Assessment to include; Policy review, baseline transport conditions, collision data analysis, development proposals, trip generation, distribution and assignment, Junction capacity modelling and impact assessment and mitigations measures.	April 2021
The Applicant and SCDC agree the assessment work carried out on the site access options to determine a single option to take forward to the Environmental Impact Assessment and Traffic Assessment.	TWG 26 April 2021 28 May 2021 and 17 September 2021
The Applicant and SCDC agree the results of the optioneering assessment and junction capacity assessment and assessment proposed to inform final decision on access option.	TWG 6 October 2021

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 checking surveys.	12 April 2022
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/>