

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Statement of Common Ground: Save Honey Hill Group

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**Document title** Statement of Common Ground between Anglian Water Services Limited and Save Honey Hill Group

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**Version No.** 5

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**Date Approved**

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**Date 1<sup>st</sup> Issued** 06 November 2023

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## Version History

Version	Date	Author	Description of change
1	03/11/2023	-	
2	16/01/2024	-	Updated for Deadline 4 following responses from SHH to version 1.
3	20/01/2024	SHHG	Amended in response to version 2, issued pre review of D4 documents
4	31/03/2024	SHHG	Updated position, before review of submissions at D6.
5	10/04/2024	SHHG/ The Applicant	Signed version

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# 1 Introduction

## 1.1 Purpose of this Document

- 1.1.1 This Statement of Common Ground (“SoCG”) is submitted as part of an application by Anglian Water Services Limited (“the Applicant”) for a Development Consent Order (DCO) under the Planning Act 2008 (‘the Application’) for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPR).
- 1.1.2 The Applicant is proposing to build a modern waste water treatment plant for Greater Cambridge on a new site area north of the A14 between Fen Ditton and Horningsea within the Cambridge drainage catchment area and in the Cambridge Green Belt, to replace the plant on Cowley Road, hereafter referred to as the existing Cambridge Waste Water Treatment Plant.
- 1.1.3 This SoCG has been prepared by the Applicant and with Save Honey Hill Group (SHHG). Any reference to ‘the parties’ means the Applicant and SHHG.
- 1.1.4 This SoCG has been prepared to identify matters agreed, matters currently under discussion or not agreed between the Applicant and SHHG.
- 1.1.5 To date, the Applicant has consulted and engaged with SHHG, as set out in Section 2 and Appendix 1 of this SOCG.

## 1.2 Approach to the SoCG

- 1.2.1 This SoCG will evolve as the DCO application progresses through examination. It is structured as follows:
  - Section 2 confirms the pre-application consultation undertaken to date between the Applicant and SHHG;
  - Section 3 identifies the relevant documents which have been considered by the parties in reaching this agreement;
  - Section 4 provides a summary of matters that have been agreed, are under discussion and not agreed;

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

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

## 1.3 Status of the SoCG

- 1.3.1 This version of the SoCG represents the position between the Applicant and SHHG as at 31 March 2024 (covering the oral submissions made at the ISH4 hearings, but prior to the D6 submissions and the further hearing on the Transport Assessment). The SOCG will be signed as agreed in the final form and submitted at Deadline 7.
- 1.3.2 A Principal Areas of Disagreement document on specific points between SoCGs will be updated and submitted to the Examining Authority (ExA) during the examination to reflect the final position reached between the parties.

## 2 Consultation and engagement

- 2.1.1 Phase One consultation consulted the community on three shortlisted site options (identified through earlier stages of the selection process) between 8 July – 14 September 2020. SHHG was formed from two groups of residents in Fen Ditton and Horningsea in early 2020, who were concerned about the proposed relocation. SHHG advised and assisted the community responding to the Phase One consultation and has participated throughout the remainder of the pre-application engagement.
- 2.1.2 In June 2021 a Community Working Group (CWG) was set up to engage and provide updated information to representatives of the community on an ongoing basis and outside of statutory consultation periods. Representatives from SHHG were invited to be part of this group. The ongoing engagement through the CWG meetings are set out in Appendix 1, Table 1.1 – Schedule of Engagement. SHHG asked to be included in the relevant Technical Working Groups (TWGs) which discussed design, landscaping and other matters, but this was rejected by the Applicant as the TWGs were forums for engaging with technical stakeholders.
- 2.1.3 SHHG were consulted under Section 47 of the 2008 Act during Phase Two consultation. Phase Two consultation was held from 23 June until 18 August 2021.
- 2.1.4 The Applicant treated SHHG, a non-prescribed consultee as per Schedule 1 of the Applications: Prescribed Forms and Procedure Regulations 2009, as 'deemed to be prescribed' and consulted them as a Section 42 consultee under the 2008 Act at Phase Three Consultation. Phase Three consultation ran from 24 February until 27 April 2022. SHHG response and how the Applicant had regard to this can be found in the application document 'Applicant Regard to S42 Responses' (Doc Ref 6.1.3) [APP-167].
- 2.1.5 The Applicant further undertook an additional round of targeted statutory consultation and consulted SHHG as part of this. SHHG's response and how the Applicant had regard to this can be found in the application document 'Targeted Statutory Consultation under Section 42 of the 2008 Act' (Doc Ref 6.1.30) [APP-195].
- 2.1.6 SHHG responses during the consultation phases were duly considered and as a result the Applicant changed aspects of the design for CWWTPR, as outlined in Appendix 1, Table 1.2 Design Changes as well as being detailed in the Applicant's Consultation Report (App Doc Ref 6.1.2) [APP-166]. SHHG outlined in the relevant representation responses that '*SHH has taken part in all phases of consultation on the emerging*

*scheme, including the overall design approaches, siting and layout, engineering, and landscape proposals. We note that some of our concerns have been taken into account in refining the scheme design from that subject to the Phase 3 Statutory Consultation and earlier design concepts, to that now submitted'. SHHG disagrees with elements of the Applicant's reporting of that consultation as set out in Appendix 1, Table 1.2.*

2.1.7 For further information on the pre-application consultation process please see the Consultation Report (App Doc Ref 6.1) [AS-115].

### **3 Documents considered in this SoCG**

In reaching common ground on the matters covered in this SoCG, the parties have considered all of the relevant application documents, including the following documents:

- Works, Land and Design Plans [REP5-017 and REP5-018]
- Design and Access Statement (App Doc Ref 7.6, section 11.2) [AS-168]
- Design Plans - Proposed Waste Water Treatment Plant (App Doc Ref 4.9.1) [REP5-021]
- Draft Development Consent Order (App Doc Ref 2.1) [REP3-003]
- Environmental Statement: Chapter 2: Project Description (App Doc Ref 5.2.2) [REP4-022]
- Environmental Statement: Chapter 3 (App Doc Ref 5.2.3) [AS-018]
- Environmental Statement: Chapter 9 (App Doc Ref 5.2.9) [REP5-030]
- Environmental Statement: Chapter 10 (App Doc Ref 5.2.10, section 2.9.1) [REP5-032]
- Environmental Statement: Chapter 13 (App Doc Ref 5.2.13) [REP5-036]
- Environmental Statement: Chapter 15 (App Doc Ref 5.2.15) [REP4-032]
- Environmental Statement: Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) [AS-190] and Transport Assessment (App Doc Ref 5.4.19.3 [REP5-072 – REP5-076].
- Gateway Building Plan (App Doc Ref 4.10.1) [APP-024]
- Landscape Ecology and Recreational Management Plan (App Doc Ref 5.4.8.14) [REP5-062]
- Other Management Plans, as relevant
- Outline Decommissioning Plan (App Doc Ref 5.4.2.3 V3; section 6.2) [AS-051]
- Planning Statement (App Doc Ref 7.5) [REP1-049]
- Planning Statement: Green Belt Assessment (App Doc Ref 7.5.3) [APP-207]

- Schedule of Amendments (App Doc Ref 1.8) [APP-008]
- Statement of Requirement (App Doc Ref 7.2) [APP-201]
- The Funding Statement (App Doc Ref 3.2) [REP4-009]
- The Consultation Report (App Doc Ref 6.1 V2) [AS-115]

## 4 Summary and Status of Agreement

### 4.1 Matters

- 4.1.1 Table 4.1 below details the matters agreed, matters under discussion and matters not agreed with Save Honey Hill Group (SHHG). The status of these matters adhere to the key outlined in 1.2.1 in this document.
- 4.1.2 For more details of the points raised reference should be made to the application and submissions into the Examination.
- 4.1.3 This SoCG addresses those points that SHHG and the Applicant have had capacity to explore together in discussions as such, Table 4.1 is not inclusive of all matters between the parties relevant to the Examination. If a matter appears in the submissions of the Applicant and/or SHHG but is not addressed in this SoCG, it indicates the matter has been addressed through other submissions and it does not mean it is not a relevant matter for ExA to consider.

**Table 4.1 details the summary of matters agreed and not agreed between the Applicant and SHHG.**

Statement/document on which agreement is sought.	Status	Comments
<p><b>Law and Policy</b> The legal and policy framework for decision making.</p>	High	<p>The Applicant notes the Relevant Representations submissions made to the Examining Authority.</p> <p>SHHG considers that the proposed development does not meet the thresholds set out in s29 Planning Act 2008 and that the application should be determined in accordance with s105 of the Planning Act 2008. SHHG considers that the proposed development does not comply with key policies in the NPPF and adopted local plans and should not be approved.</p> <p>The SHHG legal position is set out in SHH 04</p>



		<p>[REP1-171] as amplified in SHH 34 Expanded [REP4-108] and SHH 41 [REP4-109].</p> <p>The Applicant's position is set out in its submissions on the applicability of s104/105 Planning Act 2008 to the decision [AS-126].</p>
<p><b>Need for the project</b> The need for relocation of the CWWTP.</p>	<p>High</p>	<p>The Applicant notes the Relevant Representations and other submissions made to the Examining Authority.</p> <p>SHHG believes that the proposed development is not required to meet present or future operational requirements, which could be achieved by consolidation and improvement on the existing site.</p> <p>The Applicant sets out its view of the need for the proposed development in the Environmental Statement: Chapter 2 (App Doc Ref 5.2.2) [REP4-022].</p>
<p><b>Alternatives</b> The inadequacies in Anglian Water's assessment of alternatives.</p>	<p>High</p>	<p>The Applicant notes the Relevant Representations and other submissions made to the Examining Authority.</p> <p>SHHG considers that no or an inadequate assessment of the 'remaining on-site' alternative was made and that the assessment of other alternatives was flawed.</p> <p>The Applicant disagrees and considers its position is set out in the Site Selection</p>

<p><b>Development Plan</b> The application is contrary to policy in the NPPF, the adopted and emerging local plans.</p>	<p>High</p>	<p>Reports [REP2-011 to REP2-018] and the alternatives chapter of the ES [AS-018]</p> <p>The Applicant notes the Relevant Representations and other submissions made to the Examining Authority.</p> <p>The Applicant and SHHG agree that neither the adopted or emerging local plans contain policies requiring the relocation of the existing waste water treatment plant.</p> <p>SHHG’s position is that the proposed development is not compliant with key policies in the NPPF and adopted local plans and little weight should be given to the emerging proposals for NEC in the NECAAP and GCLP.</p> <p>The Applicant sets out in the Planning Statement [REP1-049] how it considers that the proposed development complies with national and local planning policies.</p>
<p><b>Green Belt</b> The impact of the proposal on the Green Belt.</p>	<p>High</p>	<p>The Applicant notes the Relevant Representations and other submissions made to the Examining Authority.</p> <p>The Applicant and SHHG agree that elements of the proposed development situated in the Green Belt comprise ‘inappropriate’ development and that very special circumstances must be demonstrated before</p>

		<p>development consent could be granted.</p> <p>SHHG considers that all of the built development proposed, including the access road, is 'inappropriate' development and that elements of the development to provide non-operational office space are not justified.</p> <p>SHHG considers that the Applicant has not demonstrated the very special circumstances necessary to permit the development, and that the application will cause significant harm to the 'openness' and purposes of the Green Belt.</p> <p>The Applicant defers to the process of determination for the Development Consent Order to conclude if very special circumstances have been demonstrated.</p>
<p><b>Design, Engineering and Landscape Concerns</b> The impact of the proposal on character and appearance, including design and landscape impact.</p>	<p>High</p>	<p>SHHG objects to the shape, size and height of the engineering design and to certain elements of the landscaping. SHHG has made proposals to define the earthwork parameters and improve other mitigation measures, including proposals to strengthen the Design Code and the LERMP.</p> <p>The Applicant notes the Relevant Representations and other submissions made to the Examining Authority by SHHG and defers to these.</p>

**Carbon**

The carbon footprint of the proposed development.

Medium

The Applicant notes the Relevant Representations and other submissions made to the Examining Authority and responded to queries at Deadline 3.

SHHG has assessed the construction carbon emissions from demolitions, which are similar to those now presented by the Applicant in REP6-115, and from expanding and improving the existing works.

The Applicant sets out the response to SHHG’s remaining carbon concerns in REP5-135, in the Applicant’s comments on Deadline 5 submissions [REP6-115].

SHHG considers that further reductions in the construction carbon emissions target for the proposed development could be achieved by the Applicant as well as net zero operational emissions, under either the CHP or biomethane options, including all activities on the site and directly related to it, without using carbon offsets or credits.

**Environmental Effects, Mitigation and Harm**

The environmental harm which will result from the development.

Medium

The Applicant notes the comments and evidence included in the Relevant Representations and other submissions concerning the scope of the project and the overall adequacy of the assessments in the

		<p>Environmental Statement.</p> <p>Outstanding technical assessments include the Flood Risk Assessment, water quality and final effluent standards, where the Environment Agency has not confirmed whether these are acceptable.</p> <p>The Applicant notes the comments and evidence included in the Relevant Representations and other submissions concerning the overall adequacy of the assessments in the Environmental Statement.</p> <p>SHHG accepts that most of the errors and omissions in the Environmental Statement, including the transport assessment, have now been corrected. SHHG considers that the significance of the effects in relation to certain topics, notably Green Belt, historic environment, landscape and visual impacts, have been under-estimated by the Applicant.</p>
<p><b>Funding and Deliverability</b> The funding and deliverability of the Development Consent Order.</p>	<p>High</p>	<p>The Applicant acknowledges the comments raised during consultation and in the Relevant Representations and other submissions, but disagrees with SHHG's submissions in relation to certainty of delivery and adequacy of funding, as set out in the Applicant's Funding Statement [REP4-009].</p>

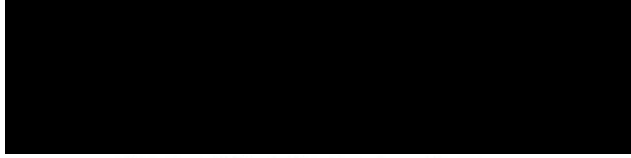
		<p>SHHG believes that the DCO and CA powers should only be granted if the Applicant can confirm that full funding for the project, including that required to cover cost inflation, over and above the HIF Grant, have been adequately demonstrated, before any Order is granted.</p>
<p><b>Overall Planning Balance</b> The overall planning balance that the Examining Authority will be required to undertake.</p>	<p>High</p>	<p>The Applicant notes the Relevant Representations and other submissions made to the Examining Authority.</p> <p>As above, the Applicant and SHHG agree that very special circumstances must be demonstrated before development consent can be granted, but disagree as to whether those circumstances have been demonstrated.</p>
<p><b>DCO Provisions</b> The content of the draft DCO and requirements.</p>	<p>Medium</p>	<p>The Applicant and SHH disagree about the drafting of certain parts of the dDCO. SHHG's position and the Applicant's responses were set out in the Applicant's response to Deadline 2 submissions [REP3-045].</p> <p>The Applicant and SHHG continue to discuss outstanding requests for drafting changes to the dDCO, principally in Article 6, Schedule 2, Schedule 14, the relevant plans and Design Code.</p>

## 5 Agreement on this SoCG

This Statement of Common Ground has been jointly agreed by:

**Name:** Mark Malcolm

**Signature:**



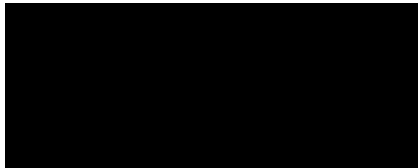
**Position:** Programme Director Major Infrastructure

**On behalf of:** **Anglian Water Services Limited**

**Date:** 11 April 2024

**Name:** Ian Gilder

**Signature:**



**Position:** Planning and Environmental Adviser

**On behalf of:** **Save Honey Hill Group**

**Date:** 10 April 2024

# Appendix 1

**Table 1:1 Schedule of engagement undertaken to date with Save Honey Hill Group**

<b>Issues discussed</b> <ul style="list-style-type: none"> <li>Appointed a chair</li> <li>Presentation from Anglian Water (AW)</li> <li>Live Q&amp;A session.</li> </ul>	Introductory meeting with Site Area Community Working Group (CWG)  21 April 2021
<b>Issues discussed</b> <ul style="list-style-type: none"> <li>Presentation from AW</li> <li>Key issues and challenges</li> <li>Live Q&amp;A session</li> </ul>	First full CWG  2 June 2021
<b>Issues discussed</b> <ul style="list-style-type: none"> <li>Project update</li> <li>Review of phase two consultation feedback</li> <li>Earthwork bank</li> <li>Architectural finishes</li> <li>Landscape proposals</li> <li>Recreation and connectivity</li> <li>Discovery Centre</li> <li>Odour</li> </ul>	CWG  2 December 2021
<b>Issues discussed</b> <ul style="list-style-type: none"> <li>Traffic and access criteria</li> <li>Live Q&amp;A session</li> </ul>	CWG  13 December 2021
<b>Issues discussed</b> Findings of the Consultation Summary Report Decisions made following the previous round of consultation, including traffic and access option chosen following feedback received from Section 47 and Section 42 consultees.	CWG  13 January 2022
<b>Issues discussed</b> <ul style="list-style-type: none"> <li>Phase Three consultation feedback</li> <li>Key design areas</li> <li>Next steps</li> <li>Live Q&amp;A session</li> </ul>	CWG  28 June 2022
<b>Issues discussed</b> <ul style="list-style-type: none"> <li>Phase Three consultation feedback</li> <li>Overview of Targeted Consultation</li> <li>Design changes</li> <li>Changes to layout of wider site area</li> <li>Changes to Gateway Building and Discovery Centre</li> <li>Live Q&amp;A session</li> </ul>	CWG  19 January 2023
Meeting requested by SHHG following site announcement, to answer questions on and hear suggestions for mitigation at the chosen site. <b>Issues discussed</b> <ul style="list-style-type: none"> <li>Consultation</li> <li>Design</li> <li>Cost</li> </ul>	Meeting with SHHG  2 March 2023



- 
- Environmental factors
  - Traffic routes
  - Archaeology

**Actions**

AW agreed to provide Figure 4a and 4b of Annex M of the odour report.

AW to provide HIA once published and willing to attend future meetings to discuss this and other matters in more detail.

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\* On 14 March 2022, the Applicant invited Save Honey Hill to another meeting during the Phase Three consultation. However, the group responded stating that due to the events that had already been attended and the opportunity to ask questions via the information lines, that there was no need for another meeting at this time.

**Table 1:2 Design changes as a result of consultation feedback from Save Honey Hill Group**

This table is an excerpt from the Consultation Report (App Doc Ref 6.1 V2) [AS-115], which has been submitted as a final document within the DCO Application. SHHG have submitted their own documents setting out responses to the matters reported in this table.

Topic area	Comment	Applicant response
Design Gateway Building	The Discovery Centre is unnecessary and adds to parking, which should be sited within the earthworks bank. The Gateway Building should be reduced in size; its mass and industrial design is inappropriate in a rural setting.	Following stakeholder response to Phase Three Consultation the Gateway Building has been reviewed in order to reduce the visual impact. The scheduled use of the discovery centre is part of the Gateway Building and is a cornerstone to the design narrative.
Landscape and visual Earth bank	The reasoning behind reduction in height of the proposed earth bank should be ignored since the outcome is unacceptable. The earth work bank should be built to a minimum of 7m with dense vegetation included on the top.	Following Phase Three Consultation responses the design has been reviewed. The earth bank height needs to be considered alongside the other amendments that have taken place to the infrastructure and internal levels of the site. The ground level inside the earth bank has been lowered by 1m and therefore the 5-metre earth bank is the equivalent of a 6m screening barrier compared to that shown at CON3 before any structural height changes to the infrastructure internal to the proposed WWTP. The design approach has balanced the height and mass of the earth bank and its screening function. The higher the earth bank the more it will screen but the greater the impact the earthwork itself will have on the landscape and historic environment. From existing ground levels in the wider context, a 5m high earth bank will be perceived as a long, linear form in the landscape which, from all but the closest locations, will not appear above the skyline. It will be integrated into its landscape setting. Increasing the height of the earthwork by 1-2m would substantially increase its presence in the landscape and enlarge the area from where it would appear above the skyline. A 7m high earthwork would be more prominent in close views than a 5m high earthwork but would not have a noticeably greater screening effect when viewed from more distant locations because the tallest elements

		on the proposed WWTP would remain visible above the earth bank.
Landscape and visual Photomontages	Note our comments re visual impact assessment - see page 16 - page 20 of SHH and Appendix I of the consultation response with alternative photomontages that should be considered.	The Applicant has fully considered all comments provided by all stakeholders on landscape mitigation, during development of the project and formally as part of the Phase Three Consultation. The viewpoints with a sub set of photomontages were discussed with the TWG for Landscape and Heritage. The locations were then adjusted based on the feedback from the members of this group. Prior to these walkovers were alongside initial ZTV models and GLIVIA3 guidance to understand locations where the Proposed Development could be viewed from. Parish Council input and Save Honey Hill responses have been considered and taken into account. Therefore, the Applicant is confident that there has been a comprehensive methodology put forward for assessing visual impact.
Landscape and visual Mitigation	The extent of off-site planting proposed should be reviewed in relation to the critique of the PEI LVA assessment and recommendations above (section 2.3.1 to 2.3.5. 2 A more ambitious approach is taken to mitigation in order to soften longer distant views of the large number of taller elements from all aspects north, south, east and west of the surrounding area in association with stakeholders and local communities. Single rows of tree planting and filling hedgerow gaps are examples.	Following Phase Three Consultation the design has been amended to improve the visual impact. The Applicant has reviewed the landscape masterplan and a significant modification has been made in design to take on board the comments made about the need to improve visual mitigation. The Applicant has reviewed design, building heights, mass of buildings and planting. They have also modified planting design to be more aligned with the local landscape. The amended designs have significantly improved the visual impact. Colour palette and final design of Gateway Building are to be determined under DCO Requirement and so will remain indicative only at this point. Furthermore, following Phase Three Consultation, there is an addition of larger trees to the early planting and woodland edges, instead of just whips and transplants. The new mitigation measures work to reduce impacts as far as possible within this landscape, through a combination of visual screening from the earthwork and over time the vegetation and a balance of openness and woodland blocks and belts. These changes remove the need for further off-site mitigation planting.

## Get in touch

You can contact us by:



Emailing at [info@cwwtpr.com](mailto:info@cwwtpr.com)



Calling our Freephone information line on **0808 196 1661**



Writing to us at **Freepost: CWWTPR**



Visiting our website at [www.cwwtpr.com](http://www.cwwtpr.com)

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

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