

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Statement of Common Ground: Cambridge City Council

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## Version History

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1	12/7/2022	KT	Changes to section 4
2	27/09/23	KT	Format and content amendments to reflect the position in the Relevant Representations and Rule 6 Letter dated 19 September 2023
3	20/12/2023	CT	CCC Amends to SOCG
4	25/01/2024		Update for Deadline 5
5	02/04/2024	-	Update for Deadline 6
6	12/04/2024		Update for Deadline 7

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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 Statement of Common Ground has been prepared by the Applicant and agreed with Cambridge City Council (CCC). CCC is a statutory consultee for the project. This SoCG confirms the position of these two parties to their agreement or otherwise on CWWTPR Application.
- 1.1.4 To date, CCC have provided views on draft proposals at different phases of consultation of the design development.
- 1.1.5 This SoCG has been prepared to identify matters agreed, still in discussion and matters currently outstanding between the Applicant and CCC.

## 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 CCC.
  - 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.

<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.

1.2.2 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
  - Carbon[REP5-032]
  - Land Quality and Contamination [REP5-038]
  - Odour Impacts [REP5-044]
  - Air Quality Impacts [REP5-026]
  - Noise and Vibration [REP5-042]
  - Public Health [REP5-034]
  - Community Impact [REP4-028]
  - Public Rights of Way [AS-153]
  - Highways and Transportation [REP5-046]
  - Climate Resilience [REP5-030]

## 1.3 Status of the SoCG

1.3.1 This version, Version 5 of the SoCG represents the position between the Applicant and CCC as of 28 March 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 CCC in a series of meetings within a Technical Working Group 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 pre-application of the DCO 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 CCC’s Relevant and Written representations, the Local Impact Report and questions submitted by the Examining Authority and their response.

## 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	CCC Comments	Status
List of relevant policies	See Planning Statement [REP1-049] Appendix 5 for a list of the relevant Development Plan policies.	CCC agrees with the list within the Applicant's Planning Statement [REP 1-049]	<b>Low</b>
Local Plan Policy Compliance Table	See Planning Statement – Local Policies Accordance Table [REP1-054].	The Local Policies accordance table [REP1-051]	<b>Low</b>
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 [REP1079] 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</p>	<b>Low</b>

section below). It shows the long history of consideration of the site of the existing plant and the surrounding underutilised brownfield area.

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>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</p>	<p><b>Low</b></p>
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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.

**Emerging Development Plan Context**

<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>The Proposed Submission AAP has been agreed by the Councils for future public consultation. Policy 1 of the AAP makes provision for NEC to accommodate 8,350 new homes and 15,000 new jobs, of which 5,400 are to be provided on the existing WWTP site.</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 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 (<a href="http://greatercambridgeplanning.org">greatercambridgeplanning.org</a>)), 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</p>	<p><b>Low</b></p>
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		provide a clear planning framework for this key strategic site as soon as possible (paragraph 17-18).	
Emerging Greater Cambridge Local Plan (GCLP)	<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 (Regulation18) 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. 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>	<b>Low</b>

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](http://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 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).

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.

An update on the water supply position is provided in the Written summary of Oral

Implications of Water Supply, including for Plan timetables

See Planning Statement [REP1-049] paragraph 2.3.30 to 2.3.36.

Water supply matters are also addressed in the Applicants response to EXQ1 21.58 [REP1-079]

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.

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.

<https://www.gov.uk/government/publications/addressing-water-scarcity-in-greater-cambridge-update-on-government->

**Low**

measures/addressing-water-scarcity-in-greater-cambridge-update-on-government-measures

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 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.

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.

Cambridge City Council together with the District Council has a robust policy position to address the issue of water efficiency going forward albeit one that is still to be finalised. The City 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

		<p>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 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.</p> <p>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>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 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 City 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>	<p><b>Low</b></p>

Progressing the emerging Development Plans

<p>Housing Trajectory on the CWWTP site in the emerging NECAAP and Local Plan</p>	<p>The draft NEECAAP 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. The housing trajectory in the emerging GCLP follows the approach in the NECAAP. See LIR paras 6.84-6.89.</p>	<p><b>Low</b></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 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><b>Low</b></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 a high degree of 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+I / 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. Contamination risk is therefore considered to be manageable, both technically and commercially.</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><b>Low</b></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. and the Applicant's response to ExQ1 2.34 [REP1-079]- 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, recognising the surrounding</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</p>	<p><b>Low</b></p>

	<p>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 identify alternative less sustainable sites to accommodate the homes which could not otherwise be delivered within NEC.</p>	<p>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>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 City 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, that 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</p>	<p><b>Low</b></p>



enable to be delivered. See LIR paras 6.1, 6.36, 6.72 – 6.77 and 6.102 – 6.106.

<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 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>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 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><b>Low</b></p>
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<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 WWTW 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 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>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><b>Low</b></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<sup>[1]</sup> 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 ‘to accelerate the relocation of water treatment works in Northeast Cambridge (subject to planning permission)...’ . 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>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</p>	<p><b>Low</b></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].	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).	
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.	<b>Low</b>

## 4.2 Benefits of the DCO Application and Project

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

Benefits of the proposal	AW Comments	CCC Comment	Status
Planning Benefits	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.  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:	The City 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 City Council considers the planning benefits that would arise to be as set out in its LIR and as	<b>Low</b>

	<p>On the existing WWTP site</p> <ul style="list-style-type: none"> <li>• 5,500 new homes</li> <li>• 23,500 m2 new business space</li> <li>• 13,600 m2 new shops local services, community, indoor sports and cultural facilities</li> <li>• 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)</li> </ul> <p>On the surrounding area</p> <ul style="list-style-type: none"> <li>• 2,850 new homes</li> <li>• 105,000 m2 new business space</li> <li>• 5,000 m2 re-provided business floorspace</li> <li>• 23,200 m2 re-provided industrial, storage and distribution space (B2 and B8)</li> </ul> <p>Partial retention of existing commercial floorspace</p>	<p>summarised at paras 6.116-6.119. but include the following:</p> <ul style="list-style-type: none"> <li>• 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 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.</li> <li>• 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</li> </ul>	
<p>Environmental Benefits</p>	<p><i>Environmental benefits</i> through the delivery of a new modern, low carbon waste water treatment facility:</p> <ul style="list-style-type: none"> <li>• significantly reducing carbon emissions (from being operationally net zero and energy neutral)</li> <li>• improving storm resilience (by making storm overflows and CSOs less likely to occur)</li> <li>• 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)</li> <li>• 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)</li> </ul>	<p>Cambridge City Council recognises the significant environmental benefits arising as a result of the proposed development including:</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p><b>Low</b></p>

- 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 odour<sup>4</sup> (when compared to the equivalent area for the Proposed Development)
- 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 the most sustainable location in Greater Cambridge for development.
  - 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

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.

Social Benefits	<p><b>Social benefits</b> through:</p> <ul style="list-style-type: none"> <li>• improving access to the countryside (by the delivery of new paths and accessible open spaces)</li> <li>• enhancing education (through the facilities provided in the Discovery Centre and increased access to the WWTP)</li> <li>• enhancing recreational opportunities (formalising recreational access and providing wider connectivity through new and enhanced public rights of way)</li> </ul> <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 City Council recognises the social benefits arising as a result of the proposed development including:</p> <ul style="list-style-type: none"> <li>• Educational opportunities for schools and community groups provided in the Discovery Centre</li> <li>• Enhanced connectivity through formalising recreational access for walking, cycling and equestrian users</li> </ul>	<b>Low</b>
Economic Benefits	<p><b>Economic benefits</b> through:</p> <ul style="list-style-type: none"> <li>• investment in construction and related employment for its duration</li> <li>• increasing operational employment</li> </ul>	<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</p>	<b>Low</b>

- 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 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.
- area’s continued growth as a strategically important economic driver for Greater Cambridge and create a vibrant new urban quarter to Cambridge.

### 4.3 Climate Resilience

4.3.1 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).

4.3.2 The Assessment of the parameters of the climate assessment is presented from a sustainable construction point of view.

**Table 4.3: Details of the summary and status of agreement on Climate Resilience**

Statement/document on which agreement is sought.	AW Comments	CCC Comments	Status
The assessment presented in Environmental Statement Climate Resilience Chapter [Doc. Ref. 5.2.9] [APP-041] assessing 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) is appropriate including the data gathering methodology, the Rochdale parameters, future baseline of 2090-2099, and the use of the two assessment methodologies for identifying risks in extreme weather	The Applicant agrees with CCC approach.	The City Council has assessed the possible impacts identified in the Climate Resilience Chapter of the ES [Doc. Ref. 5.2.9] [APP-041] from a sustainable construction view (rather than a flooding or drainage), and therefore the City Council’s comments focus on the receptor identified as	Low

on infrastructure and processes as well as the impact of the project on the environment and community.

physical infrastructure.

**Mitigation Measures**

The mitigation proposed within App Doc Ref 5.2.9 at para 2.8 are agreed.

The Applicant agrees with CCC proposal for the CEMP.

The City Council notes that weather resilience measures for the construction phase have been outlined in Chapter 9 of the ES [Doc. Ref. 2.8.25] 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 Practice (CoCP) Part A (App Doc Ref 5.4.2.1) secured under Requirement 9

The City Council notes that weather resilience measures for the construction phase have been outlined in Chapter 9 of the ES [Doc. Ref. 2.8.25] and it is important that these follow through into a Construction Environmental Management Plan (CEMP) as the proposed development progresses

**Low**

**Decommissioning**

The scope of the assessment should include the construction and decommissioning.

Review paragraph 2.7 and table 2.8 Ap Doc Ref

This applies to Cambridge City Council only

## 4.4 Carbon

- 4.4.1 This chapter presents the findings of an Environmental Impact Assessment (EIA) completed in relation to the potential carbon emissions generated by the Proposed Development.
- 4.4.2 The Assessment is set out in the Environmental Statement Chapter 10 (App Doc Ref 5.2.10).
- 4.4.3 An Outline is provided at Carbon Management Plan 5.4.10.2
- 4.4.4 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).

**Table 4.4: Details of the summary and status of agreement on Carbon**

Statement/document on which agreement is sought.	AW Comments	CC Comments	Status
<p>The assessment presented in Environmental Statement Chapter 10 Carbon (App Doc Ref 5.2.10) 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, and the baseline options for assessing the carbon emissions are appropriate.</p>	<p>The Applicant agrees with the approach from CCC</p>	<p>The City Council is satisfied with the approach to assessing carbon emissions as set out in the Carbon Chapter of the ES [Doc ref: 5.2.10] [APP-042] and the use of the Institute of Environmental Management and Assessment (IEMA) EIA Guide to Assessing Greenhouse Gas Emissions and their significance (2022).</p>	<p><b>Low</b></p>
<p><b>The scope of the assessment</b> 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.</p>		<p>The parameters of the assessment, including capital carbon from construction, transport of materials and construction works, emissions from land use change as well as the operation of the proposed ReWWTP are considered to be reasonable. CCC defer to Cambridgeshire County Council as the discharging authority on the final agreement to whole life carbon assessment.</p> <p>It is noted that only limited construction will be undertaken within Cambridge City, mostly</p>	<p><b>Medium</b></p>



associated with the vent shaft and waste transfer tunnel.

The City Council agrees with carbon emissions factors applied [Doc ref: 5.2.10] [APP-042]. There is a high level of uncertainty relating to future energy policy which affects the likely future baseline carbon intensity of national grid electricity and gas supplies.

As a result, this can impact the projected emissions avoided through the use of CHP and the export of biomethane to the grid. The City Council agrees with the Applicant's submission and considers it to be reasonable based upon current known data.

**Mitigation**

The securing of adequate mitigation measures to ensure future carbon reductions through later design stages and onsite construction activities is sought.

Mitigation provided within  
 PP 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]



Low

## 4.5 Community

- 4.5.1 The Community Chapter of the Environmental Statement Chapter 11 (App doc Ref 5.2.11) presents the findings of the 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.
- 4.5.2 The Assessment of is supported by Volume 3 - Book of Figures Community (App Doc Ref 5.3.11) and Environmental Statement - Volume 4 - Chapter 11 - Appendix 11.1 Community Questionnaire (App Doc Ref 5.4.11.1).
- 4.5.3 The Outline Community Liaison Plan (CLP) is provided at (App Doc Ref 7.8) and has been produced as part of the suite of Management Plans created from considering consultation responses.

**Table 4.5: Details of the summary and status of agreement on Community**

Statement/document on which agreement is sought.	AW Comments	CCC Comments	Status
The assessment presented in the Environmental Statement Chapter 11 Community (App Doc Ref 5.2.11) including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.	Agreed	The City 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 City Council considers that some of the impacts are beneficial to local communities. However, there are other impacts that will not have a positive impact.	Low
The inclusion and approach adopted by the CLP (App Doc Ref 7.8) is agreed.	Agreed	The City 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.	Low
<b>Public Rights of Way</b> The extent of the new bridleway and extension	It is not agreed that it is appropriate to include any further equestrian access		

<p>of the B1047 (as set out in the DDCO at Schedule 6 Part 2) to include equestrian use needs to be further considered, City Council 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>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 of the rights of way plans (App Doc Ref 4.6.6). 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 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). This is agreed with National Highways, CoCC and the Horningsea Greenway Project team. The City Council supports the amended highway design proposals for the bridge parapet to facilitate equestrian user</p>	<p style="text-align: center;"><b>Low</b></p>
<p><b>Recreational Use</b> 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 ) and the effect of further recreational impact from future development should be considered further.</p>	<p>The Applicant has proposed and held the first Combined Recreational pressure group on 24 January 2024. This combined group will continue to address the concern regarding potential recreational pressure on the area as the result of new development in North East Cambridge. The aim of the group is to continue beyond the CWWTPRP and facilitate wider long-term strategic discussion. The Applicant is not seeking</p>	<p>The City Council does not have any objection to this approach.</p>	

	to be the leader of the forum/group but is happy to facilitate its administrative set up and continue to be part of this for the future. The Applicant's role and contribution to the administrative set up of the group and any data collection or survey work is secured by the section 106 agreement and is set out in Schedule 3.		
Requirements	The Applicant has set out in its proposals for the provision of cycle parking and facilities within the Design Code (App Doc Ref 7.17) to encourage travel to site via sustainable means. Cycle parking will be covered and secure. Showers and changing facilities will be provided for staff.	The City Council recommends that cycle parking at the new facility would need to be 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.	<b>Low</b>

## 4.6 Health

- 4.6.1 The Environmental Statement Volume 4, Chapter 12 (App Doc Ref 5.2.11) provides the findings of the EIA completed in relation to the potential impacts of the Proposed Development on health. The Assessment is supported by Volume 3 - Book of Figures Health
- 4.6.2 The Assessment is supported by Volume – Book of Figures (App Doc Ref 5.3.12) and Appendix 12.1 Health Screening (App Doc Ref 5.4.12.2) and Chapter 12 - Appendix 12.3 Health Evidence Review (App Doc Ref 5.4.12.3).

**Table 4.6: Details of the summary and status of agreement on Health**

Statement/document on which agreement is sought.	AW Comments	CCC Comments	Status
Assessment Approach	Agreed	The City Council agrees with the approach taken by the Applicant to	<b>Low</b>

<p>The assessment presented in Environmental Statement Chapter 12 Health (App Doc Ref 5.2.11) including the data gathering methodology, geographical study area, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>		<p>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].</p>	
<p><b>Range of Stakeholders</b> CCC seek further clarity on the acceptance of the range of stakeholder consulted as part of the consultation process.</p>	<p>The previous engagement with this hard to reach group has been discussed with both the City Council, SCDC and CoCC and how future 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 e.g. the Ormiston Trust (or similar) as well as with the GRT Liaison Officer to support engagement with this group. 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>The City Council is not clear from the stakeholder engagement details provided [Doc ref 5.2.11] [AS-028] if any proactive engagement was undertaken with the Gypsy, Roma, Traveller (GRT) community. There are 2 sites within close proximity to the site, at Milton and on Fen Road. To ensure this minority ethnic group is adequately represented, the City Council consider that all on going community engagement plans/strategies should involve this cohort.</p> <p>It is acknowledged that whilst the pre application consultation was wide it is noted that the level of response was low [Doc ref 5.2.11] [AS-028]. Therefore, the City Council considers that there needs to be active engagement along the lines suggested to protect the interests of previously identified vulnerable population groups. CCC agrees with the additional proposals to the Community Liaison Plan to be made by the Applicant at Deadline 6.</p>	<p><b>Low</b></p>

<p><b>Traffic Monitoring</b> CCC will continue to review a the discharge of requirements if adequate provision withing 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.</p>	<p>CCC defers all matters relating to traffic and transport to CoCC as Highway Authority and this includes any amendments or corrections required by the ExA during ISH4 for review at ISH5.</p>	<p><b>Medium</b></p>
<p><b>Health and Wellbeing</b> The assessment approach and methodology presented within the Health Mental Wellbeing Impact Assessment is appropriate,</p>		<p>In respect of the mental health and wellbeing assessment [Appendix 12.3, App Doc Ref 5.4.12.3] [AS-077, the City Council is satisfied that baseline measurements have been taken.</p>	<p><b>Low</b></p>
<p><b>Community Liaison Plan</b> [REP4 -078]</p>	<p>This has now been reviewed and it is agreed that this will be managed through the final agreement to the Community Liaison Plan [REP4-078] at the discharge of requirement.</p>	<p>The City Council supports the provision of a Community Liaison Plan (CLP) as proposed in [Doc Ref 7.8] [AS-132] to be put in place to proactively inform local communities and stakeholders of any scheduled construction works and the potential duration of those works. Works falling outside of agreed core working hours should be made clear, along with any potential obstruction to PRowS, businesses, facilities and local infrastructure.</p>	<p><b>Low</b></p>

## 4.7 Land Quality and Contamination

- 4.7.1 The Land Quality chapter of the ES presents the potential impacts of the Proposed Development on Land Quality and Contamination during its construction, operational and decommissioning phases.
- 4.7.2 The supporting figures are provided at 5.3.7 Environmental Statement - Volume 3.

**Table 4.7: details the summary and status of agreement on Land Quality and Contamination**

Statement/document on which agreement is sought.	AW Comments	CCC Comments	Status
<b>Assessment Approach</b>		Land contamination is briefly discussed within Chapter 14 of The Environmental Statement [Doc ref 5.2.14] [AS-032]. In general terms, the City Council considers the contamination and land quality assessment to be acceptable.	<b>Low</b>
<b>Mitigation</b>		The City Council will not require any specific construction mitigation measures. Notwithstanding the absence of a site-wide full ground investigation report, the City Council notes a potential risk to any contractor involved in decommissioning works on the existing site, particularly where any excavations are required. However, this is a matter of standard site health and safety procedure and falls within the remit of the Health and Safety Executive.	<b>Low</b>
<b>Requirements</b>	Decommissioning will be undertaken in accordance with the Decommissioning Plan [REP4-044] and final approval will be given by the Environment Agency as discharging authority.	Decommissioning works at the existing site to be completed in full and fully in accordance with the Decommissioning Plan. This will ensure that there is no potential for any continued contamination of subsurface soils.	<b>Low</b>

## 4.8 Odour

- 4.8.1 The Odour chapter of the ES Chapter 18 (App Doc Ref 5.2.18) presents the potential impacts of the Proposed Development from odour on sensitive receptors and the surrounding environment during its construction, operational and decommissioning phases.
- 4.8.2 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)
- 4.8.3 The assessment is supported by the Book of figures ES Volume 3 Chapter 18 (App Doc Ref 5.3.18).
- 4.8.4 A Preliminary Odour Management Plan has been produced at ES Volume 4 Chapter 18 Appendix 18.4 (App Doc Ref 5.4.18.4).

**Table 4.8: details the summary and status of agreement on Odour**

Statement/document on which agreement is sought.	AW Comments	CCC Comments	Status
<p><b>Assessment Approach</b> The assessment presented in Environmental Statement Volume 2 Chapter 7 Air Quality (App Doc Ref 5.2.7) including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p> <p>Mitigation</p>	Agreed	<p>In general terms the City Council agrees with the methodology in respect of odour impact assessment [Doc. Ref. 5.2.18] [APP-050]</p> <p><b>Construction and Decommissioning Mitigation</b> The recommended construction related odour mitigation is detailed in Part A and B of the Code of Construction Practice (CoCP) – (Appendix 2.1 – A and 2.2-B of App Doc Ref 5.4.2.1 &amp; 5.4.2.2)[ APP-068 and APP-069] sets out how potential odour impacts arising from</p>	<b>Low</b>



activities associated with connecting into and diverting existing sewers and decommissioning will be managed.

Odour may be released when connecting the new transfer tunnel to the existing sewerage and when the existing waste water flows are diverted to the ReWWTP during construction. The opening up of existing sewers may result in temporary odour releases, but it is agreed that this is not expected to last for a period of more than four weeks. In order to mitigate this potential impact an air extraction system will be put in place and a mobile odour filtration unit located adjacent to the sewer shafts as noted in [Doc. Ref. 5.2.17] [APP-049]

**Operational Mitigation**

To mitigate operational odours associated with the proposed permanent 10m high waste water transfer tunnel vent stack (WTTVS) the Applicant proposes a carbon filter (located at Shaft 1) to reduce odour emission and provision for a chemical dosing facility (located on the existing WWTP upstream of Shaft 1) to prevent septicity and therefore odour formation.

The City Council has no objection to the odour mitigation measures proposed.

Requirements

The Applicant confirms that an operational odour management plan is a requisite of the final Environmental Permit required by the

The City Council understands that compliance with the measures proposed for the construction and decommissioning stages, set

Environment Agency.

The amendments to the description of the vent stack at Deadline 6 are as follows

VST.01 The ventilation stack and associated odour control unit at the interception shaft is to be designed with the follow on development in mind. Coordination with the follow on master developer regarding positioning and proximity to proposed development in their master plan must be completed. The stack must be at least 15m from an inhabited dwelling/building/office.

VST.02 The interception shaft is a design feature that requires ventilation facilities. The purpose of the ventilation facility is to passively manage air pressure in the tunnel system, a process referred to as natural aspiration. Air would be drawn in under typical/normal operations and exit less frequently under extreme operating conditions. The vent stack to be installed on the existing WWTP site will pass all exiting air through an odour filtration/odour neutralisation system prior to discharge. That system, and supporting ongoing maintenance of it, will control odour to a standard of best practicable means (or BATNEEC). Potential odour could be released via the vent stack when air exits the tunnel system under extreme operating conditions. However, the vent stack included in the proposed WWTP would allow exiting air to be directed via a carbon air treatment filter. The carbon filtration is sufficient

out within the Outline Decommissioning Plan, CoCP A and B [Doc ref 5.4.2.1 and 5.4.2.2] [APP 068 and APP 069] will be secured by requirements contained in the DCO (App Doc Ref 2.1). This will include a requirement for the preparation and approval of a detailed Construction Environmental Management Plan(s) (CEMP) which will be supported by a series of topic-based management plans as appropriate. These requirements should in the City Council's view ensure that any adverse negative construction and decommissioning odour impacts will be mitigated and minimised to an acceptable level.

For operational odours a requirement is proposed in the draft DCO for a detailed odour management plan to be submitted to and approved in writing by the relevant planning authority. It is agreed that the detailed odour management plan must be in accordance with the measures in the preliminary odour management plan and the principles and assessments set out in the relevant part of the ES (as reflected in Appendix 18.4 of doc ref. 5.4.18.4 [AS-106]. This includes reference to the proposed 10m high waste water transfer tunnel vent stack (WWTTVS) with a carbon filter (located at Shaft 1) and provision for a chemical dosing

to control adverse odour during “extreme operating conditions”. As the process is passive, and dependent upon air pressure within the sewer, it is not possible to accurately predict frequency or duration of air released from the ventilation facility, only to acknowledge that it would be intermittent, infrequent, and short-lived.

facility to prevent septicity and therefore odour formation and reduce odour emission. The Applicant has set out further details of the location and function of the vent stack and this is included within the Outline Odour Management and in addition within the Design Code. This is acceptable to the City Council.

## 4.9 Noise & Vibration

- 4.9.1 Noise and vibration impacts have been assessed during the construction, operation, maintenance and decommissioning phases of the proposed development.
- 4.9.2 The Assessment of noise and vibration is set out in ES Chapter 17 (App Doc Ref 5.2.17) together with supporting figures and appendices.
- 4.9.3 The Noise and Vibration Guidance Policy is set out in the Environmental Statement Chapter 17 Volume 4 (Ap Doc Ref 5.4.17.1) 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).
- 4.9.4 An outline [ noise management plan is provided at as part of the Outline Construction Environmental Management Plan CEMP [App Doc Ref] this is secured in Requirement [ ] of the draft DCO (App Doc Ref )
- 4.9.5 The Outline Operational Noise management plan has also been produced to demonstrate how noise and vibration would be managed during the operation of the proposed development. This is secured in Requirement [ ] of the draft DCO (App Doc Ref).

**Table 4.9: Details the summary and status of agreement on Noise and Vibration**

Statement/document on which agreement is sought.	AW Comments	CCC Comments	Status
<b>Assessment Approach</b> The assessment presented in Environmental Statement Volume 2 Chapter 17 Noise and Vibration (App Doc Ref 5.2.17. including the data gathering methodology, baseline,	The Approach has been agreed within Technical Working Groups.	The City Council is satisfied with the scope, methodology and conclusions derived as set out in (Chapter 15) of the ES [Doc ref.5.2.17] [AS-036].	<b>Low</b>

scope of the assessment and the assessment methodology set out is appropriate.			
<b>Assessment conclusion</b>	Agreed		<b>Low</b>
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. This is set out in the mitigation section of App Doc Ref 5.2.17			
<b>Construction and Environment Management Plan (CEMP)</b>	Applicant to review CEMP and disapplication of section 61	The City 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.	<b>Low</b>
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.	Applicant to review securing mechanism for reporting to SCDC of any complaints. The recommendation is within the Community Liaison Plan and finalised at the discharge of requirements.		
Regular monitoring of any complaints should be dealt with via CCC Environmental Health Department. Complaints received should be recorded and notified within the Community Liaison Plan or notification mechanism secured through the draft DCO requirements.			
<b>Mitigation</b>		<b>Construction / Decommissioning Mitigation</b> Additional secondary mitigation measures during construction are to be implemented as set out in the Noise and Vibration chapter of the ES [Doc Ref. 5.2.17] [AS-036], which includes the provision of solid site hoarding/acoustic barriers around construction compounds in select areas close to receptors, restriction of working hours to avoid sensitive times of the day and application of measures and Best Practicable Means (BPM) in accordance with BS 5228. These	<b>Low</b>

measures are reflected in the Code of Construction Practice (CoCP Part A and B) [Doc. Ref. 5.4.2.1 & 5.4.2.2] [APP 068 and APP 069]. This will include a requirement for the preparation and approval of a detailed Construction Environmental Management Plan(s) (CEMP) which will be supported by a series of topic-based management plans.

The City Council agrees that, with the implementation of construction / decommissioning noise mitigation measures as proposed, moderate adverse noise and vibration impacts would be avoided or reduced, and the resulting effects would not be significant.

**Operational Mitigation**

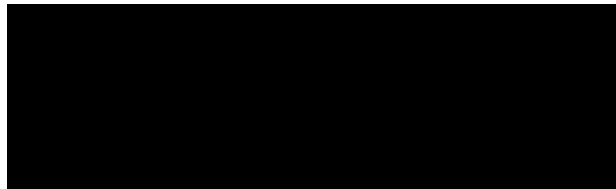
Within the City no operational noise mitigation is proposed as no adverse impacts are envisaged. However, in the City Council's view, the Applicant should provide further operational noise information and impact assessment for the WWTVS chemical dosing facility as noted above. Until this is provided for consideration it is not possible to conclude that no operational noise mitigation will be required.

## 5 Agreement on this SoCG

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

**Name:** Mark Malcolm

**Signature:**



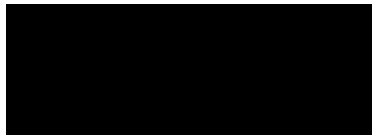
**Position:** Programme Director Major Infrastructure

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

**Date:** 11.04.24

**Name:** Heather Jones

**Signature:**



**Position:** Deputy Director Planning and Building Quality

**On behalf of:** Cambridge City Council

**Date:** 11.04.2024

## Appendix 1 Summary of Pre-Application engagement.

Matter	Record of agreement
<b>Engagement Process</b>	
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 Technical Working Groups when available and one to one meetings, if needed.	Technical Working Group (TWG) 11 March 2021
<b>Air Quality</b>	
The Applicant and CCC 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 ]
<b>Carbon</b>	
The Applicant and CCC 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
<b>Climate Resilience</b>	
The Applicant and CCC agree the design and proposals for storm management and that the process are flexible for adaption to climate change.	Technical Water Meeting with CCC consultants 17 May 2022
The Applicant and CCC agree the need for a detailed Flood Risk Assessment (FRA) to be submitted with the DCO. The assessment will cover the NPA's <sup>1</sup> requirements and the NPPF <sup>2</sup> guidance, the design flood standard will be 1:100 and will consider climate change.	
<b>Noise and Vibration</b>	
The Applicant and CCC 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 CCC 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 CCC 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 ]

<sup>1</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf)

<sup>2</sup> NPPF section 160

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

<b>Odour</b>	
The Applicant and CCC 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 CCC 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 e mail dated [ 24 June 2022 ]
<b>Traffic and Access</b>	
The Applicant and CCC 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 CCC agree the assessment work carried out on the site access options to determine a single option to take forward to the EIA and Traffic Assessment.	TWGs 26 April 2021 28 May 2021 and 17 September 2021
The Applicant and CCC 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 CCC 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 CCC agree the update to the Traffic Assessment Scoping note and the scope of the proposed checking surveys.	12 April 2022
The Applicant and CCC 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
The Applicant and CCC agree that the TTRO's required for Traffic Management will not be included in the DCO.	Meeting 13 May 2022
The Applicant and CCC agree the scope of the 2021 traffic data checking surveys and Junction assessment summary to inform the Traffic Assessment.	TWG 30 June 2022
<b>Water Resources</b>	
The Applicant and CCC 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](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/cambridge-waste-water-treatment-plant-relocation/>