

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Planning Statement: NPPF Accordance Table

Application Document Reference: 7.5.4

PINS Project Reference: WW010003

APFP Regulation No. 5(2)q

## Document Control

<b>Document title</b>	Planning Statement: NPPF Accordance Table
<b>Version No.</b>	03
<b>Date Approved</b>	16/11/2023
<b>Date 1<sup>st</sup> Issued</b>	20/11/2023

## Version History

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description of change</b>
01	16.11.2023	-	1 <sup>st</sup> Submission Version
02	26.03.2024	-	2 <sup>nd</sup> Submission Version
03	10.04.2024	-	3 <sup>rd</sup> Submission version

**Cambridge Waste Water Treatment Relocation Project  
 National Planning Policy Framework (NPPF) Accordance Table**

Relevant NPPF Paragraph Number	Requirement of the NPPF	Project Compliance with the NPPF
<b>Chapter 1</b>	<b>Introduction</b>	
1-3	<p>The National Planning Policy Framework sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans can provide for sufficient housing and other development in a sustainable manner. Preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective.</p> <p>Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.</p> <p>The Framework should be read as a whole (including its footnotes and annexes). General references to planning policies in the Framework should be applied in a way that is appropriate to the type of plan being produced, taking into account policy on plan-making in chapter 3.</p>	<p>The Planning Statement (as revised) (App. Doc. Ref. 7.5) has identified the NPPF may be considered an important and relevant matter in the determination of this DCO application at paragraphs 3.4.2 and 3.8.1.</p>
4	<p>The Framework should be read in conjunction with the Government’s planning policy for traveller sites, and its planning policy for waste. When preparing plans or making decisions on applications for these types of development, regard should also be had to the policies in this Framework, where relevant.</p>	<p>Consideration has been given in terms of the Application’s compliance with the National Policy Statement for Waste Water (NPSWW) at App. Doc. Ref. 7.5.1 Planning Statement NPSWW Accordance Table.</p>

		As the Application does not involve traveller sites, we do not consider this part of the paragraph relevant to the determination of the Proposed Development.
5	The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.	<p>This has been addressed at paragraph 3.8.2 of the Planning Statement (as revised) (App. Doc. Ref. 7.5).</p> <p>For the reasons set out at section 3.1 of the Planning Statement and as elaborated in the Applicant’s Legal Submission on the Applicability of s104 and s105 Planning Act 2008 (AS-126), the Applicant considers that the NPSWW ‘has effect’. Section 3.8 of the Planning Statement recognises that whilst primacy in the decision process lies with the NPSWW by virtue of s104(3), the application of s104(2)(d) may require some consideration of the NPPF, particularly where the NPSWW directly references the NPPF, or where the NPPF may provide more details and/or more up to date guidance than the NPSWW. This is particularly the case in this instance in respect of matters relating to good design and to the Green Belt. The same will apply in the case of the application of s105(2)(c).</p>
6	Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission. This includes the Written Ministerial Statement on Affordable Homes Update (24 May 2021) which contains policy on First Homes.	This is recognised in section 3 of the Planning Statement. Where relevant, other statements of government policy are referenced in the technical chapters of the ES (App Doc Ref 5.2) and in section 3 of the Planning Statement (as revised).
<b>Chapter 2</b>	<b>Achieving sustainable development</b>	
7-8	The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future	Paragraph 3.6.5 of the Planning Statement (as revised) states that sustainability has formed an integral part of the design, and that the principles of sustainable development has informed every part of the design process. Many of the sustainability benefits of the project are described in the LERMP [AS-066] as well as in Chapter 10 Carbon of the ES [APP-042].

	<p>generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.</p> <p>Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <ul style="list-style-type: none"> <li>a) <b>an economic objective</b> – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</li> <li>b) <b>a social objective</b> – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</li> <li>c) <b>an environmental objective</b> – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and</li> </ul>	<p>Need for the Proposed Development (as described in section 2.1 of the Planning Statement, Document Reference 7.5, AS-128) is best described as a need to deliver a vacated site in accordance with the terms of the Housing Infrastructure Fund (HIF) award and a strategic development need for the site to be redeveloped to deliver a new low-carbon city district making a key contribution to the sustainable development of Cambridge, supporting growth in the economy and making an important contribution to meeting government housing objectives (consistent with the objectives at sections 6 and 11 of the NPPF). The regional and national significance of this has been recognised in the SoS (DEFRA) s.35 direction (18 January 2021 and appended to the Planning Statement) 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.</p> <p>Decommissioning and release of the existing WWTP site will enable regeneration and the creation of a new district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) on a brownfield site within the urban area of Cambridge which is recognised as “<i>the most sustainable location for strategic scale development available within Greater Cambridge</i>” (as stated in the relevant representations of both South Cambridgeshire District Council [RR-004] and Cambridge City Council [RR-002]). The Proposed Development accords with the economic, social and environmental objectives to achieve sustainable development.</p>
--	---	--

	mitigating and adapting to climate change, including moving to a low carbon economy.	
10-13	<p>So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).</p> <p>Plans and decisions should apply a presumption in favour of sustainable development.</p> <p>The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.</p>	<p>This advice has been noted in general terms but the Applicant accepts that no specific presumption applies in this instance given the location of the Proposed Development substantially within Green Belt.</p> <p>The accordance of the Proposed Development with both adopted and emerging Local Plan policies is addressed in the Local Policies Accordance Tables (App Doc Ref 7.5.5).</p>
<b>4</b>	<b>Decision-making</b>	
39-46	<p><u>Pre-application engagement and front-loading</u>                      Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.</p> <p>Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They</p>	<p>The Consultation Report (Application Document Reference 6.1) details in full the extensive early engagement and consultation that has been undertaken with all key stakeholders and community, the comments that have been received, and how the Applicant has had regard to this feedback. This includes describing changes to the design of the Proposed Development resulting from the feedback received.</p>

<p>should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.</p> <p>The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.</p> <p>The participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle, even where other consents relating to how a development is built or operated are needed at a later stage. Wherever possible, parallel processing of other consents should be encouraged to help speed up the process and resolve any issues as early as possible.</p> <p>The right information is crucial to good decision-making, particularly where formal assessments are required (such as Environmental Impact Assessment, Habitats Regulations assessment and flood risk assessment). To avoid delay, applicants should discuss what information is needed with the local planning authority and expert bodies as early as possible.</p>	
--	--

	<p>Local planning authorities should publish a list of their information requirements for applications for planning permission. These requirements should be kept to the minimum needed to make decisions, and should be reviewed at least every two years. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question.</p> <p>Local planning authorities should consult the appropriate bodies when considering applications for the siting of, or changes to, major hazard sites, installations or pipelines, or for development around them.</p> <p>Applicants and local planning authorities should consider the potential for voluntary planning performance agreements, where this might achieve a faster and more effective application process. Planning performance agreements are likely to be needed for applications that are particularly large or complex to determine.</p>	
<b>5</b>	<b>Delivering a sufficient supply of homes</b>	
60	<p>To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.</p>	<p>Paragraphs 2.1.2 – 2.1.5 of the Planning Statement (as revised) sets out the need for the relocation of the Cambridge WWTP – once the WWTP is relocated, the existing site will be available for the delivery of new housing and jobs at the core of Greater Cambridge’s new city district: NEC. The NEC has been a long held ambition of Cambridge City Council and South Cambridgeshire District Council; a new low-carbon city on Cambridge’s last major brownfield site.</p> <p>Through the NECAAP, 8,350 homes are envisaged to be delivered to meet a significant need for more housing provision.</p>
<b>6</b>	<b>Building a strong, competitive economy</b>	



<p>85-87</p>	<p>Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.</p> <p>Planning policies should:</p> <ul style="list-style-type: none"> <li>a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;</li> <li>b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</li> <li>c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and</li> <li>d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.</li> </ul> <p>Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p>	<p>The Proposed Development will help unlock a most sustainable brownfield land for housing and employment development which will help bring forward the wider planning objectives of the host authorities arising from population growth and urbanisation in Cambridge, and in including achieving the economic ambition set for Cambridge to be the world leading life science cluster.</p> <p>The introduction of a new city district at NEC adjacent to the Cambridge Science Park and existing business cluster will ensure the location of new housing and community facilities in close proximity to places of work, helping to reduce travel needs, transport congestion and damage to air quality and providing a supportive environment for economic investment and growth.</p>
--------------	--	---

8	Promoting healthy and safe communities	
96-97	<p>Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:</p> <ul style="list-style-type: none"> <li>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</li> <li>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and</li> <li>c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</li> </ul> <p>To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <ul style="list-style-type: none"> <li>a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</li> <li>b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;</li> </ul>	<p>Chapters 11 (Community) (Application document reference 5.2.11) and 12 (Health) of the ES (Application document reference 5.2.12) set out the potential social and economic effects of the Proposed Development, and presents the mitigation measures proposed to avoid and minimise significant negative effects. The assessment considers effects on factors including employment, equality, community cohesion and wellbeing, having been informed by guidance from National Highways’ Design Manual for Roads and Bridges (DMRB), Public Health England’s Health Impact Assessment in spatial planning – ‘A guide for local authority public health and planning teams’, the Institute of Environmental Management and Assessment’s (IEMA) ‘Health in Environmental Impact Assessment; A Primer for a Proportionate Approach’, South Cambridgeshire Supplementary Planning Document for Health Impact Assessment (South Cambridgeshire District Council, 2011 and The Mental Wellbeing Impact Assessment: A Toolkit.</p> <p>A separate Equalities Impact Assessment (EqIA) (Application document reference 7.12) assesses the proposed development in respect of the Applicant’s obligation under UK equality legislation, including the Equality Act 2010, and in particular the Public Sector Equality Duty (PSED), which encourages organisations delivering public functions, such as the Applicant, to understand how different people will be affected by their activities.</p> <p>The assessments conclude that during construction and operation, the negative effects arising from the Proposed Development will not be significant.</p>

	<p>c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;</p> <p>d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and</p> <p>e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.</p>	
101	<p>Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:</p> <p>a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and</p> <p>b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.</p>	<p>Safety, security, and defence measures are considered in the technical chapters of the Environmental Statement, in particular ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) <b>[REP6-017]</b>, ES Chapter 11: Community (App Doc Ref 5.2.11) <b>[REP6-021]</b>, ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) <b>[REP6-033]</b>, ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) <b>[REP6-037]</b>, ES Chapter 20: Water Resources (App Doc Ref 5.2.20) <b>[REP6-039]</b> and ES Chapter 21: Major Accidents and Disasters (App Doc Ref 5.2.21) <b>[REP6-041]</b> and in the related Management Plans submitted. It is considered that the PD is in compliance with this paragraph as it meets the relevant requirements for security and public safety that are required in the water industry.</p>
102-103	<p>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational</p>	<p>The Applicant identifies recreational facilities affected by the Proposed Development in paragraphs 3.1.30 to 3.1.58 in ES Chapter 11: Community (App Doc Ref 5.2.11) <b>[REP6-021]</b>.</p> <p>The Proposed Development does not propose building on existing open space, sports or recreational buildings and land. The Applicant has undertaken public consultation and given regard to the consultation responses, including considering the comments raised about the land required for the Proposed Development.</p>

	<p>provision is needed, which plans should then seek to accommodate.</p> <p>Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <p>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</p> <p>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</p> <p>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</p>	<p>The Applicant recognises that Cambridgeshire has one of the lowest levels of natural green space available for public access in the UK, and therefore has taken the opportunity to provide new connections to existing PRoW as part of the design. ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [REP6-065] details how the proposals will increase recreational connectivity by augmenting the existing highway and PRoW network through the provision of the proposed new bridleway and permissive paths on the site of the proposed WWTP which deliver new opportunities for circular routes.</p> <p>The Discovery Centre will allow the Applicant to continue providing its education and community engagement programme.</p>
104	<p>Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</p>	<p>Paragraph 2.2.17 of the Planning Statement (as revised) summarises how the Proposed Development will create new and improved access to the Cambridgeshire countryside via new public rights of way and permissive footpaths which will be connected to the wider network of public rights of way.</p>
<b>9</b>	<b>Promoting sustainable transport</b>	
108	<p>Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <p>a) the potential impacts of development on transport networks can be addressed;</p> <p>b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;</p> <p>c) opportunities to promote walking, cycling and public transport use are identified and pursued;</p>	<p>The Applicant has included a Transport Assessment as part of the ES (Application document reference 5.4.19.3). This forms part of appendices to Chapter 19 Traffic and Transport of the ES (Application document reference 5.2.19). The assessment has been informed by guidance set out by the Department for Transport and further information is set out in the documents listed above. The Transport Assessment follows the Department for Transport (DfT’s) Transport Assessment Guidance and uses WebTAG.</p> <p>The Applicant has undertaken engagement with National Highways and the Highways team at Cambridgeshire County Council</p>

	<p>d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and                  e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.</p>	<p>throughout the pre-application process. A Transport Assessment (TA) Scoping Report was provided to these two consultees to inform the scope of the TA and the associated methodology through pre-application discussions.</p>
<p>109</p>	<p>The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.</p>	<p>The wording of this paragraph is drafted differently to the infrastructure-specific wording included in the NPSWW. Although a ‘significant development’, the Proposed Development is a very specific form of national infrastructure which relies primarily on import and export by pipeline and in which context transport movements (HGVs, staff and visitors) is relatively minor (and is largely a displacement of existing traffic already on the local road network).</p> <p>The rationale for this development is so that the existing WWTP site can be vacated to enable the opportunity for other sustainable development which is of regional and national significance and which best contributes to Greater Cambridge’s sustained economic growth utilising the locational benefits of NEC and the opportunities for sustainable travel that have been created by the opening of the Cambridge North Station and the interchange with the Cambridgeshire Busway and the Chisholm Trail cycle route as well as further proposed public transport and active transport routes to link to the Waterbeach New Town to the north.</p> <p>The location of the new WWTP has been determined following a comprehensive site selection process to best meet the present and future waste water needs of the Greater Cambridge catchment whilst minimising <u>so far as possible</u> its impacts on its surrounding environment. This is fully described in the Site Selection and</p>

		<p>Alternatives chapter of the ES (Application Document Reference 5.2.30).</p> <p>The Applicant has incorporated significant measures to make the Proposed Development sustainable. The Transport Assessment and ES demonstrate the scheme does not generate a significant need to travel by car and promotes sustainable travel appropriate to the proposed location by proximity to alternative non-car means of travel and through the various management plans (CTMP, CWTP, OLTP, and OWTP). It sets out primary and secondary measures for improvements to public and community transport, as well as improved active travel for non-motorised users. These include: a new footway on the east side of Horningsea Road, segregated pedestrian/cycle access to the Proposed Development, provision of a new bridleway, 30% of parking spaces to be for EV charging, and 50 cycle spaces. The incorporation of measures to protect and enhance the public rights of way network, and the delivery of new and improved sustainable active travel connections for non-motorised users including for equestrians is appropriate to the scale and nature of the proposal. The Applicant considers the Proposed Development to be consistent with this paragraph of the NPPF.</p> <p>Traffic and transport impacts are addressed in ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) <b>[REP6-037]</b> and the Transport Assessment (Appendix 19.3, App. Doc. Ref. 5.4.19.3) <b>[REP6-075a/076/078]</b>.</p>
114-117	<p><u>Considering development proposals</u>                  In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</p>	<p>The Applicant has identified appropriate opportunities to promote sustainable transport modes.</p> <p>Safe and suitable access to the site can be achieved for all users.</p>

<p>a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;</p> <p>b) safe and suitable access to the site can be achieved for all users;</p> <p>c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and</p> <p>d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</p> <p>Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>Within this context, applications for development should:</p> <p>a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;</p> <p>b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;</p> <p>c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards; d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and</p> <p>e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.</p>	<p>The design reflects current national guidance.</p> <p>Impacts on the transport network are not significant and are mitigated to an acceptable degree.</p> <p>The Transport Assessment and ES demonstrate that impacts on highway safety and cumulative residual impacts on the road network would not be severe. The wording of paragraph 115 differs from the wording in NPSWW paragraph 4.13.7 that <i>“provided that the applicant is willing to enter into planning or transport obligations or requirements can be imposed to mitigate transport impacts identified ... then development consent should not be withheld, and appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure.”</i></p> <p>So far as operational imperatives permit, pedestrian and cycle movements are accommodated on a segregated route connecting to the Horningsea Greenway and PRoW network, which also affords access to high quality public transport.</p> <p>The needs of people with disabilities and reduced mobility are addressed through the parking provision and access to buildings.</p> <p>The design minimises the scope for conflicts between pedestrians, cyclists and vehicles (by segregating routes and providing safe highway crossing and, as detailed in the DAS responds to local character and design standards.</p> <p>The design allows for efficient delivery of goods and service/emergency access.</p> <p>The design provides for charging of plug-in and other ultra-low emission vehicles.</p>
---	--



	All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.	
<b>11</b>	<b>Making effective use of land</b>	
123	Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	The Proposed Development will help unlock the most sustainable brownfield land for housing development which will help bring forward the wider planning objectives of the host authorities, arising from population growth and urbanisation in Cambridge, and in Waterbeach. Not granting development consent would preclude a new development opportunity on land where the existing WWTP is located, which has been long identified by the host authorities.
124	<p>Planning policies and decisions should:</p> <ul style="list-style-type: none"> <li>a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;</li> <li>b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;</li> <li>c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;</li> <li>d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)48; and</li> </ul>	<p>Paragraphs 2.1.2 – 2.1.5 of the Planning Statement (as revised) sets out the need for and the benefits arising from the relocation of the Cambridge WWTP – once the WWTP is relocated, the existing site will become available for the development of Greater Cambridge's new city district: NEC. The NEC has been a long held ambition of Cambridge City Council and South Cambridgeshire District Council; a new low-carbon city on Cambridge's last major brownfield site.</p> <p>Within NEC, 8,350 homes would be delivered on a highly accessible previously developed site at a time where there is a significant need for more housing provision.</p> <p>The PD also proposes new habitat creation and improves public access to the countryside through the provision of a new bridleway and improvements to existing footways on Horningsea Road.</p>



	<p>e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. They should also allow mansard roof extensions on suitable properties where their external appearance harmonises with the original building, including extensions to terraces where one or more of the terraced houses already has a mansard. Where there was a tradition of mansard construction locally at the time of the building's construction, the extension should emulate it with respect to external appearance. A condition of simultaneous development should not be imposed on an application for multiple mansard extensions unless there is an exceptional justification.</p>	
<p>125-127</p>	<p>Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.</p> <p>Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</p>	<p>The existing site has a long history of being identified for alternative development as set out at section 2 of the Planning Statement (as revised) and recorded in the Greater Cambridge North East Cambridge Area Action Plan supporting evidence entitled: Chronology of the feasibility investigations of redevelopment of the Cambridge Waste Water Treatment Plant July 2021. The existing site is identified as the most sustainable location for new development in the emerging Greater Cambridge Local Plan and the Proposed Development will enable the realisation of this development by removing a current impediment to regeneration and deliver a vacant site at this core of this area.</p> <p>Given the functional importance of the existing WWTP, redevelopment of that site for alternative housing, employment and associated uses cannot be achieved until the WWTP has been replaced with at least an equivalent WWTP elsewhere. This is the</p>

	<p>a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and                  b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.</p> <p>Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:                  a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; and                  b) make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.</p>	<p>purpose of this DCO application and the HIF funding secured from Homes England.</p>
<p>128-130</p>	<p><u>Achieving appropriate densities</u>                  Planning policies and decisions should support development that makes efficient use of land, taking into account:                  a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;                  b) local market conditions and viability;                  c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;</p>	<p>This advice is not directly related to the Proposed Development but does support the rationale of the project which is to relocate the existing WWTP so as to free-up a highly accessible and sustainable location for alternative development which will support economic, social and environmental goals to achieve sustainable development within Greater Cambridge at densities far in excess of what could be achieved on less sustainable and accessible alternative sites on the edge or outside the urban area of Cambridge.</p>

<p>d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and</p> <p>e) the importance of securing well-designed and beautiful, attractive and healthy places.</p> <p>Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:</p> <p>a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;</p> <p>b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they</p>	
---	--

	<p>would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).</p> <p>In applying paragraphs 129a and b above to existing urban areas, significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan.</p>	
<b>12</b>	<b>Achieving well-designed places</b>	
131	<p>The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.</p>	<p>Principles of Good Design have been used to inform the development of the project, which has been guided by the National Infrastructure Commission's Design Principles, advice from the Design Council and review by the Cambridgeshire Quality Panel, as described in the Design and Access Statement (DAS) (App Doc Ref 7.6 - <b>AS-168</b>). The DAS describes the design principles and objectives that have been applied to the development of the proposals, such as the design and external appearance of plant and buildings, materials and landscape planting and regulatory and environmental constraints. It explains how the design of the Proposed CWWTP has been developed to meet the required functionality of infrastructure development of this nature, incorporating novel technologies which help reduce the footprint of the proposed WWTP to 34ha, about half the size of the existing WWTP. This leaves the remainder of the site for landscapes areas, environmental mitigation and enhancements to screen the proposed WWTP and, for recreation, to produce a scheme which is innovative and which promotes a high level of sustainability.</p> <p>The design principles and objectives in the design and access statement have evolved during the engagement process and comply with relevant development plan policies and will be</p>

		<p>secured by discharge of Part 2 of Requirement 7 Detailed Design of the dDCO (App Doc Ref 2.1) [REP-037].</p>
<p>135</p>	<p>Planning policies and decisions should ensure that developments:</p> <ul style="list-style-type: none"> <li>a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;</li> <li>b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;</li> <li>c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);</li> <li>d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;</li> <li>e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and</li> <li>f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.</li> </ul>	<p>As described in Environmental Statement Chapter 2: Project Description (App Doc Ref 5.2.2) [REP6-009], the proposed development will allow Anglian Water Services Limited to continue to provide critical waste water treatment and recycling services to residents in Cambridge and Greater Cambridge in a modern, low-carbon facility.</p> <p>The proposed development will have a design life to at least 2090, and the supporting infrastructure (i.e. the transfer tunnel, pipelines and outfall) will have a designed capacity sufficient to meet population growth projections plus an allowance for climate change into the 2080s. Furthermore, there is capability for expansion in space that has been provided within the earth bank and by modification, enhancement and optimisation of the design to accommodate anticipated flows into the early 2100s.</p> <p>Therefore, the proposed development is designed to function well and improve the overall life quality of the area to provide critical waste water treatment and recycling services to residents in Cambridge and Greater Cambridge over the lifetime of the development which is anticipated will last to 2100s. As such, the design of the propose development complies with criteria a).</p> <p>As fully described in DAS (App Doc Ref 7.6 - AS-168), the design of the proposed WWTP and the associated works on the proposed WWTP site has followed a complex, multi-faceted approach to develop the final proposals. A multifunctional approach has been evolved through site selection process and community consultations, and finally adopted to deliver landscape enhancement, visual screening, ecological habitat creation and</p>

		<p>recreational opportunities for local communities. This approach provides mitigation for potential environmental impacts that have been identified through the Environmental Impact Assessment (EIA), including impacts on landscape character and visual amenity process and also for enhancement of the local environment.</p> <p>A particularly important element of the Proposed Development is the landscaped area which surrounds the proposed WWTP. A circular earth bank, woodland blocks, hedges, glades and biodiverse wildlife grassland are features of the comprehensive landscape masterplan embedded as a core part of the design to mitigate the landscape and visual impacts of the Proposed Development, to expand and create recreational opportunities and biodiversity rich areas to expand the network of rights of way.</p> <p>As such, the Proposed Development uses organic ‘natural’ screening on the top of the earth bank, tree and hedgerow planting rather than building an ‘engineered’ looking screen and use of ‘natural’ materials that blend into the landscape, which will be sympathetic to the local character with a design that will be visually attractive. Therefore, the Proposed Development is compliant with Criteria b) and c).</p> <p>As detailed in chapter 6 – Evolution of Design in DAS (App Doc Ref 7.6 - <b>AS-168</b>), the Applicant has gone through a range of different design options for plant footprint, layout options, earth bank sizing and screening and vehicular access and heights of buildings. The Applicant’s professional teams worked through by means of professional workshops starting off firstly with understanding what the metrics of measurement are including qualitative feedback from stakeholders before the final decision on options were made, of which the masterplan proposals were demonstrated in Chapter 7 of DAS. It justifies that the design of</p>
--	--	--

		<p>Proposed Development has gone through a contingent process to reach the final masterplans to establish and maintain a strong sense of place using the best arrangement possible for all key aspects of the proposed development. Therefore, the Proposed development is compliant with criteria d).</p> <p>As described in DAS, one of the design principle of the Proposed Development is to align with Anglian Water Limited’s Health, Safety and Well-being initiatives protecting the workforce at all times and providing a safe site for operational staff and site visitors. As suggested above and detailed in DAS, the proposed development will provide a Discovery Centre in the Gateway Building for education and discovery for both employees and the public visitors. The landscape- led design approach will also provide well-designed landscaped area expanding and creating recreational opportunities and biodiversity rich areas to expand the network of rights of way. As such, the design of the proposed development will create places that are safe, inclusive and accessible. Therefore, the proposed development is compliant with criteria e) and f).</p>
136	<p>Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.</p>	<p>The Design and Access Statement (DAS) (App Doc Ref 7.6 - <b>AS-168</b>) describes the proposed landscaping and planting which will be implemented during the construction period. This includes new trees to be planted in gaps in the existing line of trees along the eastern side of Horningsea Road and the replacement of failed planting in an existing shelter belt east of Horningsea Road. A programme of maintenance of the existing planting in the shelter belt will improve growth rates. The design has evolved to minimise landscape and visual impacts, for example by providing new woodland, trees, hedgerows and meadows around the Proposed Development. This will be secured through the Landscape, Ecological and Recreational Management Plan (LERMP) at ES Appendix 8.14 (App Doc Ref 5.4.8.14) [<b>REP6-065</b>].</p>

<p>137</p>	<p>Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.</p>	<p>The Consultation Report (Application Document Reference 6.1) details in full the consultation that has been undertaken, the comments that have been received, and how the Applicant has had regard to this feedback. This includes describing changes to the design of the Proposed Development resulting from the feedback received.</p> <p>The Design and Access Statement (DAS) (App Doc Ref 7.6 - <b>AS-168</b>) highlights the important role of consultation with a wide range of stakeholders in informing the design process. The Applicant has had regard to consultation feedback received throughout the pre-application phase. Feedback has been considered alongside a range of technical and environmental factors to inform the design evolution of the Proposed Development, which is recorded in the Design and Access Statement.</p>
<p>139-140</p>	<p>Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:</p> <ul style="list-style-type: none"> <li>a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or</li> <li>b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.</li> </ul> <p>Local planning authorities should ensure that relevant planning conditions refer to clear and accurate plans and drawings which provide visual clarity about the design of the development, and are</p>	<p>The DAS and Consultation Report (App Doc Ref 6.1) [AS-115] describes the design approach that has been taken. The Applicant has engaged with the Design Council, Cambridgeshire Quality Panel and stakeholders throughout the development of the design. Final details will be secured by discharge of Part 2 of Requirement 7 Detailed Design of the dDCO [<b>REP5-003</b>].</p>



	<p>clear about the approved use of material design of the development, and are clear about the approved use of materials where appropriate. This will provide greater certainty for those implementing the planning permission on how to comply with the permission and a clearer basis for planning permission on how to comply with the permission and a clearer basis for local planning authorities to identify breaches of planning control. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).</p>	
<b>13</b>	<b>Protecting Green Belt land</b>	
<p>142-143</p>	<p>The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p>Green Belt serves five purposes:</p> <ul style="list-style-type: none"> <li>a) to check the unrestricted sprawl of large built-up areas;</li> <li>b) to prevent neighbouring towns merging into one another;</li> <li>c) to assist in safeguarding the countryside from encroachment;</li> <li>d) to preserve the setting and special character of historic towns; and</li> <li>e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul>	<p>A significant proportion of the Proposed Development falls within the Green Belt. Paragraphs 4.8.26 - 4.8.44 of the Planning Statement (as revised) assesses the Proposed Development's impact against the purposes of Green Belt and section 6 addresses the overall assessment and considerations which should inform the Secretary of State's decision on whether the Very Special Circumstances needed to justify a grant of development consent have been demonstrated.</p> <p>The PD will be contained within a strong earthwork bank. It will be surrounded by a significant area of green infrastructure which would provide screening, help to reduce any potential visual impact, and consequently retain openness around it. The PD will therefore not result in the unrestricted sprawl of large built-up areas and is compliant with purpose (a).</p> <p>Whilst the PD would provide the opportunity for the existing site to be made available to new development, the WWTP itself is infrastructure development. As such, nearby settlements would</p>

		<p>retain their individual identifies and would not merge into one another. This is inline with purpose (b).</p> <p>Whilst the PD encroaches onto the countryside and causes moderate harm, it is considered the PD would restore the land's existing contribution to the countryside as per purpose (c).</p> <p>The land of the PD is identified in the Greater Cambridge Green Belt Assessment – LUC 2021 as making limited or no contribution to purpose (d) in terms of preserving the special character of towns. This is due to the land not being closely associated with Cambridge's large built-up area and is strongly distinct from it. The land does however pose a moderate harm in diminishing the role of land that currently contributes to the quality of Cambridge's setting, reducing the settlement gap between Fen Ditton and Horningsea. However, it is consider that the proposed mitigation and enhancement measures will partly restore the land's existing contribution to the Green Belt and purpose (d).</p> <p>The PD as a whole seeks to enable the recycling of derelict and other urban land by removing the present WWTP operation as it prevents the aspirations of the regeneration of NEC to its full extent, as envisaged by the Councils. If it is not possible to locate the PD within an existing urban area then the development of the WWTP outside urban boundaries is not considered harmful to urban regeneration objectives. The PD is therefore considered to comply with purpose (e).</p>
152-155	<p><u>Proposals affecting the Green Belt</u>                  Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p>	<p>The extent of the Proposed Development which constitutes inappropriate development in the Green Belt is addressed in the response to ExQ1-11.1.</p> <p>Paragraphs 4.8.26 - 4.8.44 of the Planning Statement (as revised) assesses the Proposed Development's impact against the purposes</p>

	<p>When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p> <p>A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:</p> <ul style="list-style-type: none"> <li>a) buildings for agriculture and forestry;</li> <li>b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;</li> <li>c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;</li> <li>d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</li> <li>e) limited infilling in villages;</li> <li>f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and</li> <li>g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.</li> </ul>	<p>of Green Belt and section 6 addresses the overall assessment and considerations which should inform the Secretary of State’s decision on whether the Very Special Circumstances needed to justify a grant of development consent have been demonstrated.</p> <p>Although a number of elements of the PD fall within the exceptions list of development considered to be not inappropriate in the Green Belt (ie the transfer tunnels, proposed access roads to the WWPT and connecting infrastructure and the discharge point, which would fall under “<i>engineering operations</i>” and “<i>local transport infrastructure which can demonstrate a requirement for a Green Belt location</i>”) overall the Project constitutes development which is ‘inappropriate’ in terms of NPPF Green Belt policy. Therefore the very special circumstances (“VSC”) test needs to be applied. In applying this policy, however, and deciding whether or not the arguments in favour of the development clearly outweigh the harm by virtue of being inappropriate development in the Green Belt and any other harm, it is relevant to consider the physical characteristics of the whole development in the light of the NPPF, in particular, paragraphs 154 and 155. The degree of any ‘other harm’ must be properly assessed, including consideration against the purposes of the Green Belt designation and policy. Therefore any actual effect on openness needs to be identified and weighed in the planning balance.</p> <p>Paragraphs 4.8.26 - 4.8.44 of the Planning Statement (REP1-49) and Green Belt Assessment [APP-207] assess the Proposed Development’s impact against the purposes of Green Belt and section 6 addresses the overall assessment and considerations which should inform the Secretary of State’s decision on whether the Very Special Circumstances needed to justify a grant of development consent have been demonstrated.</p>
--	---	---

	<p>Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:</p> <ul style="list-style-type: none"> <li>a) mineral extraction;</li> <li>b) engineering operations;</li> <li>c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;</li> <li>d) the re-use of buildings provided that the buildings are of permanent and substantial construction;</li> <li>e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and</li> <li>f) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.</li> </ul>	
<b>14</b>	<b>Meeting the challenge of climate change, flooding and coastal change</b>	
158-159	<p><u>Planning for climate change</u>                  Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.</p> <p>New development should be planned for in ways that:</p> <ul style="list-style-type: none"> <li>a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and</li> </ul>	<p>Section 4.14 of the Planning Statement (as revised) and Chapters 9 and 10 of the Environmental Statement (Climate Resilience, and Carbon, App. Doc. Ref. 5.2.9, and 5.2.10) [REP6-017 and REP-019] set out the assessment of the potential carbon emissions generated by the Proposed Development. They also set out how the proposals plan to be energy neutral and operate at a carbon net zero, thereby adhering to the targets within the Climate Change Act 2008.</p> <p>The assessment in relation to climate resilience set out in Chapter 9 Climate Resilience (Application document reference 5.2.9) has used the latest UK climate projections (UKCP18), considering RCP8.5 highest emissions scenario for the East of England. Impacts of climate change to the 2090s (2080-2099) are the furthest future time period for which climate projections are available and which are expected to cover the first approximately 60 years of the operational lifetime of the Proposed Development. The Proposed</p>

	<p>b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.</p>	<p>Development currently has no specified end-of-life and is therefore expected to continue to operate into the 2090s and beyond. During this time routine maintenance, renewals and upgrades to equipment and processes are expected. Some of these activities are included as mitigations to the future impacts of climate change.</p>
162	<p>In determining planning applications, local planning authorities should expect new development to:</p> <p>a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and</p> <p>b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.</p>	<p>Chapter 10 of the Environmental Statement (App. Doc. Ref. 5.2.9) [REP6-017] and the Design and Access Statement (App. Doc. Ref. 7.6) outline how the Proposed Development has considered climate change and energy within its design evolution.</p>
165-166	<p><u>Planning and flood risk</u></p> <p>Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p> <p>Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.</p>	<p>Chapter 20 of the Environmental Statement (Water Resources, App. Doc. Ref. 5.2.20) [REP6-039] and the Flood Risk Assessment (Appendix 20.1, App. Doc. Ref. 5.4.20.1) [REP6-084] consider the potential impacts of the Proposed Development on surface water features, groundwater features, and flood risk.</p> <p>The Proposed WWTP is located entirely within Flood Zone 1 (at lowest risk of flooding). ‘Water compatible’ infrastructure (outfall, pipes and tunnel) falls within Flood Zones 2 and 3 and are not considered to be at high risk from fluvial flooding with the implementation of best practice construction methodology which is captured in the Code of Construction Practice (Application document reference 5.4.2.1 and 5.4.2.2) [REP6-049 and REP6-051].</p>
167-171	<p>All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p>	<p>Chapter 20 of the Environmental Statement (Water Resources, App. Doc. Ref. 5.2.20) [REP6-039] and the Flood Risk Assessment (Appendix 20.1, App. Doc. Ref. 5.4.20.1) [REP6-084] consider the potential impacts of the Proposed Development on surface water features, groundwater features, and flood risk. It is expected that</p>

<p>a) applying the sequential test and then, if necessary, the exception test as set out below;</p> <p>b) safeguarding land from development that is required, or likely to be required, for current or future flood management;</p> <p>c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and</p> <p>d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.</p> <p>The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.</p> <p>If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.</p> <p>The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on</p>	<p>any impacts to water resources would be temporary, although there may be some potential impacts during construction.</p> <p>The proposed WWTP is considered ‘Less Vulnerable’ in terms of flood risk vulnerability and is sequentially located within Flood Zone 1 and therefore passes the Sequential Test.</p> <p>Other water compatible elements of the Proposed Development are deemed appropriate development within Flood Zones 1, 2 and 3a. Additionally, below ground pipelines and tunnel elements of the Proposed Development located in Flood Zone 3b would remain operational during flood conditions and would have a negligible impact on floodplain storage, surface water flows or flood risk elsewhere. It is considered that these elements in Flood Zone 3b are also considered appropriate development.</p>
---	--

	<p>whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:</p> <ul style="list-style-type: none"> <li>a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and</li> <li>b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.</li> </ul> <p>Both elements of the exception test should be satisfied for development to be allocated or permitted.</p>	
<p>172-173</p>	<p>Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the planmaking stage, or if more recent information about existing or potential flood risk should be taken into account.</p> <p>When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;</li> <li>b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;</li> </ul>	<p>The proposed WWTP is sequentially located within Flood Zone 1. The nature of the Proposed Development requires waterside infrastructure (outfall) and below-ground river crossings (pipelines and tunnel) within or below Flood Zone 3. The outfall and river crossings, which are water-compatible infrastructure, must be located at or below the River Cam, which is in Flood Zone 3. Table 1-3 of the ES Appendix 20.1 Flood Risk Assessment (5.4.20.1) [REP6-084] demonstrates that the water-compatible elements of the scheme within Flood Zone 3 are considered appropriate development, satisfying the sequential test requirement.</p> <p>The Applicant’s response to ExQ1-21.51 addresses the exceptions test requirement.</p> <p>As stated in the CoCP Part A, where possible construction compounds and storage areas would be located within Flood Zone 1. For construction of the Waterbeach river crossing, and the outfall, a waterside location is required for temporary compounds and storage areas. It would be impractical for construction purposes to locate these temporary compounds and storage areas within Flood Zone 1, as they need to be next to the river crossing. Waterside compounds and storage areas would be temporary in</p>



	<p>c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;</p> <p>d) any residual risk can be safely managed; and</p> <p>e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.</p>	<p>nature, and will include flood resilience measures, as outlined in Section 7.5 of the CoCP Part A (App Doc Ref 5.4.2.1) [REP6-049]. Staff working on site would be subject to a flood warning and evacuation plan.</p>
175	<p>Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:</p> <p>a) take account of advice from the lead local flood authority;</p> <p>b) have appropriate proposed minimum operational standards;</p> <p>c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and</p> <p>d) where possible, provide multifunctional benefits.</p>	<p>A Drainage Strategy (Application Document Reference 5.4.20.12) [REP6-090] has been prepared in respect of the Proposed Development. The report sets out details of the drainage requirements for the permanent works associated with the scheme.</p>
<b>15</b>	<b>Conserving and enhancing the natural environment</b>	
180-181	<p>Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);</p> <p>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;</p> <p>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;</p> <p>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</p> <p>e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land</p>	<p>Chapter 8 Biodiversity of the ES (Application document reference 5.2.8) [REP6-015] sets out the Applicant’s assessment of potential effects of the Proposed Development on internationally, nationally and locally designated sites of ecological or geological conservation importance.</p> <p>This concludes that the Proposed Development will have some impact on biodiversity receptors during construction and operation. These are detailed in Chapter 8 Biodiversity of the ES (Application document reference 5.2.8). However, once the mitigation measures required by the CoCP have been implemented, these impacts are not considered likely to be significant. The Proposed Development also provides for a biodiversity net gain of 20%.</p> <p>The Proposed Development is not located in a valued landscape. A landscape and visual impact assessment (LVIA) has been undertaken in respect of the Proposed Development. The findings</p>



	<p>instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and</p> <p>f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</p> <p>Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</p>	<p>and conclusions of this assessment and potential effects on landscape character and visual amenity are reported in Chapter 15 Landscape and Visual Amenity of the ES (Application document reference 5.2.15) [REP6-029].</p> <p>The assessment considers landscape character assessments and associated studies within the scope of the defined study area. The assessment has considered local and national guidance to ensure that all relevant assessments/studies are included in the assessment in respect of the Proposed Development. As such, the assessment takes into account the Greater Cambridge Landscape Character Assessment and relevant local planning policies.</p> <p>Chapter 20 Water Resources of the ES (Application document reference 5.2.20) [REP6-039] sets out the Applicant’s assessment on the potential effects of the Proposed Development on the water environment.</p> <p>The assessment identifies that there are potential beneficial effects of effluent discharge on water resources in the River Cam.</p> <p>Chapter 17 Noise and Vibration of the ES (Application document reference 5.2.17) [REP6-033] conclude that with the implementation of mitigation measures during construction, there will be no significant effects in respect of the Proposed Development. During operation, there would also be no significant effects in respect of noise and vibration.</p>
185-187	<p><u>Habitats and biodiversity</u></p> <p>When determining planning applications, local planning authorities should apply the following principles:</p> <p>a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less</p>	<p>ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [REP6-015] provides information on the condition of the habitats present within and surrounding the Proposed Development and assesses the impact of the Proposed Development before and after mitigation. Paragraph 5.1.8 of Environmental Statement Chapter 8 (Diversity, App. Doc.</p>

	<p>harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;</p> <p>b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;</p> <p>c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and</p> <p>d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.</p> <p>The following should be given the same protection as habitats sites:</p> <p>a) potential Special Protection Areas and possible Special Areas of Conservation;</p> <p>b) listed or proposed Ramsar sites; and</p> <p>c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.</p>	<p>5.2.8) identifies benefits of the Proposed Development which include:</p> <ul style="list-style-type: none"> <li>• Reptile species through creation of habitat suitable for use including hibernacula and refuge areas; and</li> <li>• Habitats within the proposed WWTP through creation of more diverse grassland, woodland, scrub and seasonal ponds along with additional ecological features such as bat and bird boxes and bee banks. This additional habitat provision will support the local Nature Recovery Network.</li> </ul> <p>The Biodiversity Net Gain Assessment and Report (App. Doc. Ref. 5.4.8.13) [REP4-054] concludes that the design of the Proposed Development will result of a net gain of not less than 20% in all unit types – achieved through creation of a variety of habitats.</p> <p>There are no SSSIs within the Order Limits of the Proposed Development. Chapter 8 Biodiversity (Application document reference 5.2.8) sets out how the Proposed Development will not have any adverse effects on a SSSI.</p>
188	<p>The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect</p>	<p>The advice has been noted.</p>

	<p>on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.</p>	
<p>189-190</p>	<p><u>Ground conditions and pollution</u>                  Planning policies and decisions should ensure that:                  a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);                  b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and                  c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.</p> <p>Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.</p>	<p>The Land Quality chapter of the Environmental Statement (Chapter 14, App. Doc. Ref. 5.2.14) [REP6-027] sets out how the Proposed Development has considered its potential impacts during construction, operation and maintenance on: soils and geology (including impacts arising from land contamination), and human health (including land users and surrounding users).</p> <p>The Applicant has also assessed all land within the Order Limits for sources of contamination, the details of which are set out in Chapter 14 Land Quality of the ES (Application document reference 5.2.14). Primary mitigation measures will ensure that the design of the operational site includes appropriate bunding of tanks and use of hardstanding to break any significant pathways for contamination.</p>
<p>191</p>	<p>Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:                  a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;</p>	<p>The pollution effects of the Proposed Development on health, living conditions and the natural environment are addressed in the ES. The Land Quality chapter of the Environmental Statement (Chapter 14, App. Doc. Ref. 5.2.14) sets out how the Proposed Development has considered its potential impacts during construction, operation and maintenance on: soils and geology (including impacts arising from land contamination), and human health (including land users and surrounding users), and related impacts are considered in other parts of the ES including air quality (ES Chapter 7), biodiversity (ES Chapter 8), community (ES Chapter 11), health (ES Chapter 12), noise and vibration (ES Chapter 17) and cumulative effects (ES Chapter 22).</p>

	<p>b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and</p> <p>c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.</p>	
192	<p>Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.</p>	<p>Air Quality has been assessed in Chapter 7 of the Environmental Statement (App Doc Ref 5.2.7) [REP6-013]. It sets out the assessment and findings of the Proposed Development and concludes that the proposal would not lead to any breach in air quality thresholds.</p>
193-194	<p>Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.</p> <p>The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than</p>	<p>The final site selection report is included at Environmental Statement - Volume 4 - Chapter 3 - Appendix 3.5 Stage 4 Site Selection Report (App Doc Ref 5.4.3.5) [REP2-017]. This process sought to minimise the effects on neighbouring land uses.</p>

	<p>the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.</p>	
<b>16</b>	<b>Conserving and enhancing the historic environment</b>	
200-203	<p><u>Proposals affecting heritage assets</u>                  In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.</p>	<p>The Historic Environment chapter of the Environmental Statement (Chapter 13, App. Doc. Ref. 5.2.13) [REP6-025] sets out the Proposed Development's potential impacts to built heritage, archaeological remains and historic landscape.</p> <p>The assessment includes a description of the heritage value (significance) of all assets within the defined study area. The use of heritage value versus significance is included within this assessment and a description of the methodology used to assess this.</p> <p>Assets with greater potential to be impacted have been described and assessed in greater detail. A setting assessment, to gauge its contribution to the heritage value of an asset, has also been undertaken for all relevant assets</p> <p>Desk-based research has been undertaken to inform the assessment of effects on the historic environment, including the technical appendix, Geophysical and trial trenching surveys (Application Document reference 5.4.13.5) [AS-087].</p> <p>A programme of evaluation, initially including geophysical survey and trial trenching, was agreed with Cambridgeshire Historic Environment Team (CHET). Geophysical surveys were undertaken in March 2021 and September 2021. Trial trenching was undertaken between November 2021 and February 2022.</p>

	<p>Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.</p> <p>In determining applications, local planning authorities should take account of:</p> <p>a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;</p> <p>b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and</p> <p>c) the desirability of new development making a positive contribution to local character and distinctiveness</p>	
204	<p>In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.</p>	<p>The Proposed Development will not remove or alter any historic asset.</p>
205	<p><u>Considering potential impacts</u></p> <p>When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.</p>	<p>Chapter 13 Historic Environment of the ES (Application Document reference 5.2.13) [REP6-025] presents the Applicant's assessment of the potential effects on the historic environment as a result of the Proposed Development and this is considered to be less than substantial harm.</p> <p>Section 4.10 of the Planning Statement considers the extent of impact of the Proposed Development on the significance of the setting of the identified designated assets within the Order Limits.</p>
206-210	<p>Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:</p>	<p>Harm to, or loss of, the significance of a designated heritage asset is considered in Chapter 13 Historic Environment of the ES (Application Document reference 5.2.13). In the design of the Proposed Development, the Applicant has given meticulous consideration to the desirability of sustaining, and where</p>

	<p>a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;                  b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional<sup>68</sup>.</p> <p>Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.</p> <p>Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.</p> <p>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</p>	<p>appropriate, enhancing the significance of heritage assets and their setting.</p> <p>Section 4.10 of the Planning Statement considers the extent of impact of the Proposed Development on the significance of the setting of the identified designated heritage assets within the Order Limits having regard to the findings in Chapter 13 Historic Environment of the ES (Application Document reference 5.2.13).</p> <p>The planning balance in respect of the Proposed Development’s impact on the historic environment set out in section 4.10 of this Planning Statement concludes that the Proposed Development will not cause ‘substantial harm’ to any heritage asset as it is not physically impacting an asset itself or causing ‘total loss’ of any asset. In the case of a change to the setting of a heritage asset, the impact of the Proposed Development equates to ‘less than substantial harm’. In particular, there will be less than substantial harm caused to Baits Bite Lock, Horningsea and Fen Ditton Conservation Areas, and the Grade II Listed Poplar Hall and Grade II* Listed Biggin Abbey. With the application of the primary, secondary and tertiary mitigation described in this chapter, it is predicted that the level of harm on these heritage assets will be at the lower end of less than substantial harm. The substantial need for the Proposed Development and benefits set out in section 2 of the Planning Statement, it is considered that the harm to the heritage assets identified is outweighed by the public benefits and need for the relocation of the existing Cambridge WWTP.</p>
--	---	---



	<p>Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.</p>	
<p>211-214</p>	<p>Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.</p> <p>Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.</p> <p>Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.</p> <p>Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future</p>	<p>The Proposed Development will not result in the loss of any heritage assets.</p>



	conservation of a heritage asset, outweigh the disbenefits of departing from those policies	
<b>17</b>	<b>Facilitating the sustainable use of minerals</b>	
217-218	<p>When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy. In considering proposals for mineral extraction, minerals planning authorities should:</p> <ul style="list-style-type: none"> <li>a) as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty and World Heritage Sites, scheduled monuments and conservation areas;</li> <li>b) ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;</li> <li>c) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source<sup>72</sup>, and establish appropriate noise limits for extraction in proximity to noise sensitive properties;</li> <li>d) not grant planning permission for peat extraction from new or extended sites;</li> <li>e) provide for restoration and aftercare at the earliest opportunity, to be carried out to high environmental standards, through the application of appropriate conditions. Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances;</li> <li>f) consider how to meet any demand for the extraction of building stone needed for the repair of heritage assets, taking account of the need to protect designated sites; and</li> <li>g) recognise the small-scale nature and impact of building and roofing stone quarries, and the need for a flexible approach to the duration of planning permissions reflecting the intermittent or low rate of working at many sites.</li> </ul>	<p>The land quality assessment contained in Chapter 14 Land Quality of the ES (Application document reference 5.2.14) [REP6-027] sets out that two Mineral Safeguarding Areas (MSA) are present within the study area related to the River Terrace Deposits and Chalk. The assessment concludes that there are no potential significant effects identified as a result of the Proposed Development.</p>

	<p>Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.</p>	
--	--	--

## 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)