



By email only

Date 27th April 2022

Dear Sir/Madam

Cambridge Waste Water Treatment Plant Relocation (CWWTPR) Phase 3 Consultation

This This is the response provided on behalf of Cambridge City Council (the City Council) to Anglian Water's third public consultation in respect of the on the CWWTPR proposal which opened on 24th of February 2022 and invited comments up to the 27th April 2022.

The City Council responded to the two previous public consultations in letters dated 5th October 2020 and 17 August 2021, respectively.

Proposed Order Land

The current proposed line of Development Consent Order land will encompass the existing Cambridge Waste Water Treatment Plant (CWWTP) and the site of the Relocated Cambridge Waste Water Treatment Plant (ReWWTP), together with a tunnel and pipeline corridors; waste water transfer tunnel, treated effluent transfer (including River Cam Outfall) and a Waterbeach transfer pipeline.

The CWWTP is located on Cowley Road Cambridge.

The core site for the proposed ReWWTP is located south of Horningsea with the A14 on its southern boundary. The core site is within the Cambridge Green Belt transected by a County Wildlife Site which follows a historic railway alignment.

To that end the proposed Order land includes land in both Cambridge City Council's area (in particular the CWWTP) and South Cambridgeshire District Council's area (in particular the ReWWTP). To that end both are local authorities to which s42 and s43 of the Planning Act 2008 apply.

Proposed Development

The proposed development, by virtue of the Secretary of State's direction under section 35 of the Planning Act 2008 dated 18 January 2021 ('the s35 Direction') is to be treated as development for which development consent is required in accordance with the Planning Act 2008 on the basis that the proposed Development by itself is nationally significant for the reasons set out in the s35 Direction

The Potential Benefits and Impacts of the Proposed Development

The Secretary of State in the Annex to the s35 Direction noted in particular the proposed project would -*"provide a key contribution to the development of Cambridge, particularly to the North East of the city, and to the investment in waste water infrastructure; enable the relocation of the existing Cambridge Waste Water Treatment Plant, the development of that brownfield site, and the development of provision of waste water services to a proposed development at Waterbeach New Town"* and in addition *"is likely to support growth in the economy through its contribution to the development of North East Cambridge;"*.

The City Council recognises the significance of the relocation of the CWWTP towards achieving the objectives set out in the emerging North East Cambridge Area Action Plan. Within Policy 15 of the Cambridge City Local Plan 2018, this area is considered for the development of a *"revitalised, employment focussed area centred on a new transport interchange"*

The City Council welcomes the opportunity to comment on this latest consultation and notes it will be an Interested Party in accordance with s102 of the Planning Act 2008 once any application for development consent in respect of the project has been accepted and the examination of the DCO commences.

It is recognised that the decision maker for this procedure is the Secretary of State for Environment, Food and Rural Affairs following the examination and report by the Planning Inspectorate's Examining authority panel. As Local Planning Authority for its area (pursuant to the Town and Country Planning Act 1990 alone) which includes the proposed DCO land (along with

South Cambridgeshire District Council ('the District Council'), the City Council acknowledges that it has no role as a decision maker in respect of the project but, as set out in National Infrastructure Planning Advice Note 2 it has a very important role at this pre-application stage as well as at the examination stage, in particular with regard to the provision of the statutorily required Local Impact Report.

It is nevertheless clear that it is for the Examining authority to assess and examine the DCO in accordance with the statutory test under s104 of the Planning Act 2008 which will include assessing any of the potential benefits identified by the City Council's area as well as the wider district and other regions from the proposal. The examining authority and the Secretary of State will also need to consider and weigh up any potentially negative impacts which will be identified by the Interested Parties as well which may arise from the development and the potential for mitigation/reduction of such impacts.

All the local authorities whose land is affected or would be encompassed by the proposed DCO have engaged constructively with the Anglian Water during the pre- application in accordance with the Statement of Community Consultation agreed with Anglian Water.

This response serves to highlight those areas where the City Council considers further questions arise and the need for clarification remains as well as where information is required to help the City Council form as clear a view as possible on all the impacts of the proposal and which will be reflected its representations to the DCO examination and also in particular inform its Local Impact Report

Impact of the Proposal

Redevelopment of North East Cambridge

The CWWTP site lies within an area of land allocated for development in both the City and District Council's adopted development plans. Mirror policies are included in the Cambridge Local Plan 2018 (Policy 15) and the South Cambridgeshire Local Plan 2018 (Policy SS/4). The wider site, described as Cambridge Northern Fringe East and new railway station is allocated, for "*the creation of a revitalised, employment focussed area centred on a new transport interchange*" with the allocation for "*high quality mixed-use development, primarily for employment uses such as B1, B2 and B8, as well as a range of supporting commercial, retail, leisure and residential uses (subject to acceptable environmental conditions)*". It states that "*the amount of development, site*

capacity, viability, timescales and phasing of development will be established through the preparation of an Area Action Plan (AAP) for the site.

The supporting text to the adopted plans makes clear that *“Exploration of the viability and feasibility of redevelopment of the Cambridge Water Recycling Centre within Cambridge City to provide a new treatment works facility either elsewhere or on the current site subject to its scale will be undertaken as part of the feasibility investigations in drawing up the AAP. If a reduced footprint were to be achieved on the current site this could release valuable land to enable a wider range of uses. Residential development could be an option subject to appropriate ground conditions, contamination issues, amenity and air quality”* (Cambridge Local Plan paragraph 3.35, South Cambridgeshire Local Plan paragraph 3.34).

The City and District Councils (‘the Councils’) have jointly prepared the emerging North East Cambridge Area Action Plan (NECAAP) that includes the allocated site and also the Cambridge Science Park to the west and other adjoining land. In January 2022, the Councils each (at South Cambridgeshire District Council Cabinet meeting held 10th January and a decision by the Executive Councillor for Planning Policy and Transport following a Cambridge City Council Planning & Transport Scrutiny Committee held 11th January) *“agreed the North East Cambridge Area Action Plan: Proposed Submission (Regulation 19) ... and Proposed Submission Policies Map ... for future public consultation, contingent upon the separate Development Control Order being undertaken by Anglian Water for the relocation of the Waste Water Treatment Plant being approved”*. They also agreed a full suite of supporting documents, evidence, and topic papers.

The mirror committee reports for each Council advises that *“The extent and ambition for the area’s regeneration has grown since that time [i.e., the start of the AAP process] and, in particular, following the confirmation of the Housing Infrastructure Funding (HIF) to relocate the Waste Water Treatment Plant (WWTP) that, if approved, would enable a comprehensive approach to this urban site. The Area Action Plan is predicated on that relocation taking place. Combined with the delivery of significant new transport infrastructure that will serve North East Cambridge, there is now an opportunity to realise regeneration across the area which can deliver a balanced, mixed and self-sustaining new city district.”*

The Area Action Plan (the AAP) has been the subject of three rounds of public consultation and has been refined at each stage having regard to issues raised as well as preparation of a full suite of evidence and topic papers:

- Issues and Options – 8th December 2014 – 2nd February 2015

- Issues and Options – 11th February – 25th March 2019
- Draft Area Action Plan – 27th July – 5th October 2020 the mirror committee reports submitted to the District Council on 14 October 2021, and the City Council on 11 January 2022 advises

The mirror committee reports submitted to the District Council on 14 October 2021, and the City Council on 11 January 2022 addressed the relationship between the AAP and the ReWWTP, including a response to comments querying whether it needed the CWWTP needed to be relocated at all and whether the full environmental costs of this were being considered through the preparation of the AAP. The reports made clear that the ReWWTP is being advanced by Anglian Water through a DCO following confirmation of Anglian Water's successful bid for the grant of the Housing Infrastructure Fund made, in partnership with Cambridge City Council as a relevant landowner and developer and prioritised and promoted by Cambridgeshire and Peterborough Combined Authority.

In addition to preparation of the AAP to Regulation 19 stage, the Councils published in November 2021 the Preferred Options (known as the First Proposals) for a new joint Greater Cambridge Local Plan (GCLP) being prepared by the two local planning authorities that will cover both administrative areas. The preparation of the GCLP has considered a wide range of spatial options to meet development needs in the Greater Cambridge Area.

Evidence supporting the GCLP is clear that the North East Cambridge site ('the NEC') is one of the most sustainable locations for development in the area. A critical finding in the climate change evidence (page 12) that was important in determining the proposed development strategy is that location is the biggest factor in impacts on carbon emissions. The preferred strategy therefore focuses growth at a range of the best performing locations in terms of minimising trips by car as demonstrated by the Greater Cambridge Local Plan Transport Evidence. In terms of non-car mode shares and car trips per dwelling, our transport evidence concludes that development at NEC is the best performing location considered (page xviii, and section 14.3).

The Preferred Options therefore includes the NEC and says that it "*will form an important part of the development strategy for the Local Plan. This site is one of the last few remaining significant brownfield sites within the city, where comprehensive redevelopment will support new homes and jobs as part of a new city district*" (Policy S/NEC: North East Cambridge).

The AAP committee reports emphasised that the DCO process is a separate statutory planning process from the GCLP plan-making process and will be determined under different legislation.

The ReWWTP is therefore not a project or proposal within the scope of the joint GCLP or the AAP. Rather both plans are being prepared on the assumption that the CWWTP will be relocated but this is not a policy requirement of either plan. The CWWTP relocation is however, included in the Sustainability Appraisal (SA) for both the emerging GCLP and the AAP (see the GCLP First Proposals Sustainability Appraisal Report and NEC AAP Proposed Submission Sustainability Appraisal Report), as a plan or project being brought forward by another body, as part of assessing the cumulative impacts of the Plans. Any SA will be updated as necessary as the plans and the DCO proposal go through their respective processes.

The local planning authority recognises that the formal agreement by the Councils of the Proposed Submission AAP (Regulation 19) and the preparation of the Regulation 18 GCLP will be relevant factors in the DCO Examination process and demonstrate commitment to development of the NEC area.

The Greater Cambridge Local Development Scheme (LDS) sets out the plan making timetable and process for both the emerging GCLP and the AAP. The LDS is clear that the plans will only progress to the later formal stages (proposed submission publication for consultation and submission for independent examination in public) when the DCO for the ReWWTP is determined and if it is approved. If the DCO is not approved that will clearly lead to the need to reconsider and amend the plans. The decision either way will form a key part of demonstrating that the plans are deliverable.

Key matters to be considered further

A development of this scale and complexity will clearly give rise to a range of potential impacts. Whilst the proposed applicants have engaged extensively with the Councils representatives, there remain important issues that the scheme needs to address in more detail to enable the City Council to provide a comprehensive response to the examination of the proposed DCO and through its our Local Impact Report which it will submit to the examination.

The City Council as noted above recognises that the proposed development does nevertheless provide an important opportunity not only for the release for positive development of the CWWTP site but also to deliver an exemplar ReWWTP facility, in terms of innovative design, sustainability approach and use of technology.

Decommissioning of existing plant

Details relating to the decommissioning activities at the existing site and an assessment of those activities have not been included in the Consultation documentation. It is anticipated such details will include the draining / cleaning of existing tanks (including waste treatment / disposal), ensuring mechanical and electrical safety and security, and prevention of rainwater storage in open top tanks.

However, the consultation documentation does not provide further information on the demolition of structures and site preparation for the site's redevelopment. It is however noted that the Scoping Opinion issued by the Planning Inspectorate (November 2021) adopted pursuant to Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 notes that in paragraph ID 2.1.2 the Environment Statement for the Proposed Development should describe the future decommissioning activities at the CWWTP that will be required, *"...to the extent that they can be reasonably foreseeable to facilitate any future development that will be subject to a separate planning permission."*

To that end, details in relation to the decommissioning activities involved including the identification of any waste arising and any temporary and permanent effects will need to be provided to allow for the appropriate impact assessments to be carried out.

Odour

The main potential source of odour impact for Cambridge will be the wastewater transfer tunnel between the CWWTP and ReWWTP ('the WW transfer tunnel').

From an operational level the City Council, along with other neighbouring Districts to the WW transfer tunnel site, will need to be able to assess and understand in greater detail potential odour impacts associated with the proposed ReWWTP.

Alongside the WW transfer tunnel structure, the proposals provide for three ventilation shafts in addition to primary inlet points and pumping infrastructure. The three ventilation shafts are proposed with one adjacent to the B1047 Horningsea Road and the Poplar Hall Farm access road; one close to Red House Close, Fen Ditton; and the third located within the CWWTP. It is stated that in the case of potential odour from the ventilation shafts associated with the transfer tunnel, the design, the location, and height of vents will be modified to mitigate against odour

impacts where possible and that a suitable maintenance regime will be put in place to minimise the potential for odour.

There is currently no odour modelling and prediction of odour level contours available for these vent shaft locations – although the principles outlined, which include filters and above ground level discharges, are noted. Local site-specific significance of odour impact assessment has also not been provided for the transfer tunnels' infrastructure between the existing and proposed site. This information will be required as ideally in advance of any DCO application to allow the City Council to form a view on the local impacts of the scheme from odour.

Carbon

It is noted that in paragraph ID 2.1.2 of Scoping Opinion adopted by the Planning Inspectorate in respect of the DCO proposal requires an assessment of the cumulative impacts of the proposal for the new works together with the effects of waste generated from demolition activities at the existing sewage works. This should include an assessment of cumulative carbon impacts.

Such details will need to be provided as part of the any Sustainability Appraisal for either or both the AAP and the GCLP and therefore ought to be included in the assessment of the DCO application as well.

Noise

Further information is required on the likely residual / retained / altered CWWTP operational infrastructure at the existing Cowley Road Plant / Works. This is particularly important in the City Council's view if the full benefits of relocation to allow for the desired redevelopment of this previously developed land are to be realised in the way the Council's seek.

Details of the retained infrastructure and any noise and potential odour impacts will need to be detailed. The City Council is concerned that these future residual uses of the CWWTP site should complement rather than conflict with neighbouring future sensitive uses such as the future NECAAP site in terms of noise, servicing, odour generation including any venting / ventilation (depending on design sewage systems may need a venting system to allow gases to escape the system avoiding dangerous build ups or airlocks to form).

Other Matters

The City Council is committed to increasing the quality and flows of water in the surrounding water courses and supports the shift to low carbon/energy utilities infrastructure as part of its commitment to securing net zero carbon in Cambridgeshire.

Evidence related to the greater intensity of rainfall events and the ability of the new drainage infrastructure to help manage more effectively the environmental and amenity impacts of such events on the river environment, and upon local communities are also important aspects which will inform the City Council's position in terms of the benefits and effects from the development proposed. Anglian is therefore requested to set out more completely how the development will align with these objectives.

Next Steps

The comments raised through this response serve to indicate those areas where further information will be required in order for the City Council to set out its position clearly and to prepare its Local Impact Report at the DCO stage. In some areas, the request for additional information reflects the importance to the City Council of being able to clearly understand the benefits, impacts and mitigation available/proposed for any adverse effects of the proposal in order to finalise a view overall on the proposals and to help inform the examination of the DCO. The City Council therefore would welcome further dialogue and, in any event, looks forward to continued engagement with Anglian Water to examine further the key issues highlighted in this response, noting the opportunity to deliver an exemplar ReWWTP facility, in terms of innovative design, sustainability approach and use of technology both prior to and during the DCO stage.

I trust, nevertheless, that in the meantime these comments will be taken into consideration. Please do not however hesitate to contact me if you require further clarification on any of the matters raised in this consultation response.

Yours faithfully

Stephen Kelly
Joint Director of Planning and Economic Development
On behalf of
Cambridge City Council