

Anglian Water Cambridge Waste Water Treatment Plant Relocation Project

To: Environment and Green Investment Committee

Meeting Date: 16th September 2021

From: Steve Cox, Executive Director, Place & Economy

Electoral division(s): Waterbeach and Kings Hedges

Key decision: No

Forward Plan ref: n/a

Outcome: To seek delegated powers for officers, where there is insufficient time to take the item to Committee, to ensure that the Nationally Significant Infrastructure Project (NSIP) timescales can be met, thus allowing our submissions to be given full weight by the Planning Inspectorate (PINS) in the determination process.

Recommendation: It is recommended that:

- a) The Committee endorse the proposed officer technical response to Anglian Water's statutory consultation for the Cambridge Waste Water Treatment Plant Relocation Project, set out in Appendix 3;
- b) The Executive Director: Place and Economy on behalf of Cambridgeshire County Council be delegated authority to submit NSIP related responses in regard to the Cambridge Waste Water Treatment Plant Relocation Project, to the Planning Inspectorate on behalf of Cambridgeshire County Council and its regulatory functions, in consultation with the Chair or Vice Chair of the Environment and Green Investment Committee, only on occasions where there is not enough time for a report to be delivered to the Environment and Green Investment Committee; and
- c) Where delegated powers are used, circulate the draft response to Local Members and members of the Environment and Green Investment Committee ahead of sign off and submission to the Planning Inspectorate.

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Member contacts:

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1. Background

- 1.1 Anglian Water are proposing to relocate the Waste Water Treatment Plant currently on Cowley Road, Cambridge, to the north of the A14 south of Horningsea. The proposed development is considered to be a nationally significant infrastructure project (NSIP). In line with section 37 of the 2008 Planning Act (as amended); this will require an application to be submitted for a Development Consent Order (DCO).
- 1.2 As an NSIP application (for which a DCO is required) the proposed relocation of the Waste Water Treatment Plant will not be determined by the County Council as the Waste Planning Authority. Responsibility for accepting and examining the NSIP applications rests with the Secretary of State (for Environment, Food and Rural Affairs). The Planning Inspectorate carries out certain functions related to national infrastructure planning on behalf of the Secretary of State.
- 1.3 The County Council has a distinct role in this process alongside Greater Cambridge Shared Planning. Officers have engaged in providing pre application advice from key specialist teams in the authorities, including from officers acting as the Council's Highway Authority and Lead Local Flood Authority.
- 1.4 Local Authorities are statutory consultees in their own right for any proposed NSIP within their area. Cambridgeshire County Council is a statutory consultee in the NSIP process. The role of the authorities is not to pass judgement on the merits of the application, but to scrutinise the applicant's assessment of the NSIP application, offer technical advice as part of the consultation process and ensure that adequate public consultation is carried out.
- 1.5 Whilst the NSIP legislation does not specify any differences between 'host' planning authorities, in their role as statutory consultees, there is an understanding or assumption, set out in common practice, that if permission is granted by the Secretary of State the requirements (or effectively planning conditions) in the DCO are discharged, monitored and enforced by the Council(s) that would normally be the determining authority i.e. for this project within Cambridgeshire the County Council. However, as this project links into the regeneration of North East Cambridge, officers have agreed in principle that GCSP will take the lead, with the Waste Planning Authority acting as a consultee. In addition, in the event of a non-material or material changes to the proposal the decision making powers are still retained by the Secretary of State.
- 1.6 As an NSIP proposal, Anglian Water has to date undertaken two public consultations with the general public, 'host' authorities, and other key stakeholders to help inform their proposal. One non-statutory in Summer 2020, and one statutory held this summer. A third and final statutory consultation is planned in 2022 prior to the submission of the application to the Planning Inspectorate (PINS). Impacts in relation to the Coronavirus have been considered by Anglian Water and are discussed further in paragraph 4.3 of this report.
- 1.7 The officer technical response to the recent statutory consultation held July - August 2021 is enclosed in appendix 3. The committee is invited as part of this paper to endorse this response, (recommendation c). Anglian Water are aware this committee will be endorsing the officer technical response and will accept any additional comments this committee may wish to make

- 1.8 Appendix 1 sets out the six stages involved with a NSIP application and Appendix 2 clarifies the role of the local authority at each of the stages (excluding the decision). PINS guidance is clear that a local authority and the local community are consultees in their own right. Whilst local authorities should have regard to what the community is saying, it is not intended that they necessarily adopt all of those views put to them. In this context, local authorities in particular must conduct themselves in line with the National Policy Statements and the relevant guidance.
- 1.9 Paragraph 6.2 of the PINS Advice Note two: The role of local authorities in the development consent process, states that “Local authorities should engage proactively with a developer even if they disagree with the proposal in principle. It is important to recognise that a local authority is not the decision maker but will want to contribute towards the development of the emerging proposals with the benefit of their detailed local knowledge. Local authorities are not undermining any ‘in principle’ objections to a scheme by engaging with a developer at the pre-application stage.”
- 1.10 If recommendations a) and b) within this paper are approved, the outcome will be that officers will have the ability to use delegated powers to ensure that consultation timescales set by national legislation are able to be met, where there is not sufficient time for a committee decision to be taken. *Where such delegation is sought via the Chair and Vice Chair of the Environment and Green investment Committee, officers will circulate the draft response to Local Members and members of the Environment and Green Investment Committee ahead of sign off and submission to the Planning Inspectorate.*

2. The Proposal

- 2.1 Anglian Water are proposing to relocate the Cambridge Waste Water Treatment Plant. The new low carbon facility will recycle water and nutrients, and produce green energy. In the summer of 2020 Anglian Water ran a public consultation on 3 shortlisted sites. In January this year Anglian Water announced their preferred site, north of junction 34 of the A14.
- 2.2 The relocation of the Waste Water Treatment Works from Cowley Road enables the redevelopment of the wider area referred to as North East Cambridge delivering circa 8,000 homes and 20,000 jobs. The Greater Cambridge Planning Service are in the process of drafting an Area Action Plan to guide development in the area over the next 20 years. Consultations with the public have been held, the most recent being last Summer (2020). The Environment and Sustainability Committee approved the Cambridgeshire County Council response to the consultation on 17th September 2020.
- 2.3 The new facility is proposed to be operationally net zero and Anglian Water are seeking to reduce “capital” or “embedded” carbon during the construction phase. Within the consultation material Anglian Water states... “The opportunity to condense the footprint of the site, combined with new efficient treatment processes and harnessing renewable energy generation on site, will reduce the overall energy consumed. This smaller facility area and the compact design, alongside the site’s shorter distance to return treated water to the River Cam, reducing overall lifetime carbon emissions compared to the current facility.”
- 2.4 Anglian Water’s proposals include establishing new habitats for wildlife, creating improved access to the Cambridgeshire countryside connecting to existing footpaths and access routes. There are extensive landscape proposals to mitigate the visual impact and a

discovery centre offering education opportunities included as part of the facility.

3. Planning Policy

- 3.1 The policy framework for determining an NSIP application is set out in Section 104 of the Planning Act 2008 (as amended), set out below:

In deciding the application the Secretary of State must have regard to:

- a) any national policy statement which has effect in relation to development of the description to which the application relates (a “relevant national policy statement”);
 - b) the appropriate marine policy documents (if any), determined in accordance with section 59 of the Marine and Coastal Access Act 2009;
 - c) any local impact report (within the meaning given by section 60(3)) submitted to the Secretary of State before the deadline specified in a notice under section 60(2);
 - d) any matters prescribed in relation to development of the description to which the application relates; and
 - e) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State’s decision.
- 3.2 The relevant documents in relation to this application from the Cambridgeshire perspective are the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021); the South Cambridgeshire District Council and Cambridge City Council Local Plans (2018); and any Local Impact Report submitted during the Examination. The National Planning Policy Framework (NPPF) 2019 is also a material consideration.

4. NSIP Pre-Application Process

- 4.1 As this report has been brought to the Environment and Green Investment Committee ahead of the formal NSIP application submission, the pre-application process is currently being undertaken i.e. step 1 in Appendix 1. Of the pre-application stages shown in Appendix 2 the following have been completed:
- Provided comment on the draft Statement of Community Consultation (SoCC).
 - Commented on the phase one non-statutory consultation from the applicant Under Section 42 of the Planning Act 2008 (as amended).
- 4.2 ‘Host’ authorities are strongly encouraged to use the pre-application period to start their own evaluation of the local impacts of the proposal. ‘Host’ authorities should then begin to compile the Local Impact Report (LIR) as soon as the application has been accepted formally by the Secretary of State and they have been invited to submit an LIR. This approach will enable the LIR to be produced within the deadlines. PINS advice is that ‘Host’ authorities should ensure any necessary internal authorisation processes are in place to meet the timetable (which is the basis for this report).
- 4.3 Anglian Water’s recent pre-application statutory public consultation (23rd June to 18th August 2021) was held whilst adhering to the Coronavirus guidance and restrictions. This has meant a different approach to consulting with elements like public exhibitions and meetings being difficult to arrange during the Coronavirus restrictions. Instead a number of

webinar virtual exhibitions were made available online. The officers' technical response to the consultation was submitted to meet the deadline set. This is included in appendix 3. Anglian Water were made aware this is subject to this Committee endorsement and agreed will accept any amendments.

- 4.4 A third pre-application statutory consultation is planned in 2022. Once the DCO is submitted the host authorities will be required to make a factual assessment of all the consultation that has taken place and submit an Adequacy of Consultation report under Section 55 of the Planning Act 2008 (as amended). The host authorities will have a very constrained timescale in which to assess the consultation response and respond to PINS (14 calendar days) on whether the consultation has met the necessary NSIP and councils' Statement of Community Involvement requirements (taking account of the restrictions discussed in paragraph 4.3 above). PINS only has 28 days following receipt of the DCO to decide whether to accept the DCO application or not, which is why the host authority timescale is so short.

5. NSIP Application Process

- 5.1 Once Anglian Water submits their DCO application to PINS for the relocation of the Cambridge Waste Water Treatment Plant, currently programmed for 2022, the project will move into the 'acceptance' stage as identified in Appendix 1. If their application is accepted for examination by PINS we should be notified of this, including whether the Secretary of State will appoint a single Examining Inspector, or a panel of up to five Examining Inspectors (known as the examining authority (ExA)) to examine the application. The Examination is carried out in public.
- 5.2 Following notification of the above, the local 'host' authorities will then be notified of the preliminary meeting to discuss procedural matters. After which an Examination timetable should be set, including tight deadlines for when information needs to be submitted to PINS. At the pre-examination stage, local 'host' authorities are encouraged to continue to engage with the developer. Agreement on any remaining issues should be sought and/or negotiations continued. There may also be the need to continue negotiation in respect of any compulsory acquisition affecting any local 'host' authority's land holdings or interests. Reaching agreement on as many issues as possible in advance of the examination is likely to lead to a more focused and expedient examination process for all participants.
- 5.3 During the Examination, the local authorities will:
- Respond to the Examining Authority's (ExA's) written questions which are normally based on an initial assessment of the application, (including the principal issues of the proposed scheme), and the representations received from interested parties;
 - Prepare and submit to PINS a Local Impact Report (LIR), setting out the likely impacts of the proposed scheme on the County Authority's area, by using local knowledge and robust evidence, and set out the relevant local planning policy framework and guidance;
 - Prepare and submit to the Planning Inspectorate a Statement of Common Ground (SOCG), a joint written statement between the applicant and the County Council and/or other parties or 'host' authorities, setting out matters that they agree or are in disagreement on; and
 - Represent the County Council and make oral representation at the issue specific hearing(s) and if necessary the open floor hearing(s). The subject of the hearings is

based on specific elements / issues of the application that are raised during the NSIP process.

- 5.4 There is also provision in the Planning Act 2008 (as amended) for the applicant to apply for other consents, for example Compulsory Purchase Order (CPO) and drainage consents, deemed by a DCO.
- 5.5 To avoid any undue delay to the NSIP process and Examination it is important that the tight deadlines set out in the Examination Timetable are met. The timescale for handling an NSIP application are set out in the legislation. It is noted that PINS as the Examining Authority may disregard late responses, which is why officers are seeking to follow PINS guidance and get delegations set up at the pre-application stage. Irrespective of any delegations passed to officers to meet the necessary timescales set by legislation, the following is proposed to be followed to ensure good practice and ensure an open and transparent decision making process:
- Key documentation and updates to be provided to members of the Environment and Green Investment (E&GI) Committee and local County Councillors by e-mail at the earliest opportunity to ensure that key deadlines are known in advance and any comments on the documentation provided as early as possible, particularly during the 14 and 28 day deadlines;
 - Responses to PINS to either be circulated to members of E&GI Committee and local County Councillors by e-mail for their records, or where time is permitting the draft response taken to E&GI Committee for endorsement; and
 - Where deemed necessary, member briefings or specific topic meetings will be set up to provide guidance on the NSIP process and technical responses provided.

6. Alignment with corporate priorities

6.1 Communities at the heart of everything we do

As this is not a County Council proposal there are no specific significant implications identified by officers for this priority. However, Local Authorities are statutory consultees in their own right for any proposed NSIP within their area. Cambridgeshire County Council is a statutory consultee in the NSIP process. Any NSIP response provided by the County Council will (where applicable) ensure that the information produced is capable of assessing this priority before a recommendation is provided by PINS and a decision reached by the Secretary of State.

6.2 A good quality of life for everyone

As set out in paragraph 6.1.

6.3 Helping our children learn, develop and live life to the full

As set out in paragraph 6.1.

6.4 Cambridgeshire: a well-connected, safe, clean, green environment

As set out in paragraph 6.1.

6.5 Protecting and caring for those who need us

As set out in paragraph 6.1.

7. Significant Implications

7.1 Resource Implications

The following bullet points set out details of significant implications identified by officers:

- Finance – The cost of processing the NSIP application will need to come from the existing revenue budget. As the application is handled by PINS no planning application fee is received from the applicant. Officers negotiated a Planning Performance Agreement for the pre-application advice stage, to try to resource the project and reduce the cost to the public purse, but this has not covered the true cost of the resource and specialist advice required to assess the DCO application and any discharge requirements (like planning conditions) that would arise from any consent granted. This is in addition to existing pressures from other NSIP projects in Cambridgeshire.
- Staff – As a statutory consultee in the initial NSIP process and post NSIP decision if granted, the resources to deal with the application are taken from the County Council statutory consultee staffing resources that are already stretched.

7.2 Procurement/Contractual/Council Contract Procedure Rules Implications

The following bullet points set out details of significant implications identified by officers:

- Procurement – Where specialist officer advice does not exist within the Council(s) relevant specialists may be procured to ensure that the Council(s) has guidance on the key specialist areas. This is to ensure the authorities have the relevant specialist advice to allow officer comments to be provided on technical matters.
- Contractual / Council Contract Procedures – Any specialist advice required to inform this project will need to ensure it meets Council procedures, in addition to the financial implications discussed in paragraph 7.1 above.

7.3 Statutory, Legal and Risk Implications

There are no significant implications for this priority, other than the financial and resource implications required to support this project, which has the potential to include significant legal advice.

7.4 Equality and Diversity Implications

There are no significant implications for this priority that are not capable of being addressed through comment on the applicant's DCO application. The applicant is required to satisfy the Equity Impact Assessment requirements when they submit their application.

7.5 Engagement and Communications Implications

There are no significant implications for this priority that are not capable of being covered by the submission of the Adequacy of Consultation to the Planning Inspectorate.

7.6 Localism and Local Member Involvement

The following bullet points set out details of implications identified by officers:

- Localism – As this proposal is deemed to be a Nationally Significant Infrastructure Project (NSIP) the decision will not be made by the County Council. It will be essential therefore that the Council as a statutory consultee provides the 'local' knowledge to help inform the Secretary of State's decision.
- Local Member Involvement – PINS guidance sets out the role of the local authority, and officers will ensure that local members are kept informed at key stages in the NSIP process.

7.7 Public Health Implications

There are no significant implications for this priority that are not capable of being addressed through comment on the applicant's Environmental Impact Assessment information and the DCO application.

7.8 Environment and Climate Change Implications on Priority Areas

There are no significant implications for this priority that are not capable of being addressed through comment on the applicant's Environmental Impact Assessment information and the DCO application.

Have the resource implications been cleared by Finance? Yes

Name of Financial Officer: Sarah Heywood

Have the procurement/contractual/ Council Contract Procedure Rules implications been cleared by the LGSS Head of Procurement? Yes

Name of Officer: Henry Swan

Has the impact on statutory, legal and risk implications been cleared by the Council's Monitoring Officer or LGSS Law? Yes

Name of Legal Officer: Fiona McMillan

Have the equality and diversity implications been cleared by your Service Contact?

Yes

Name of Officer: Elsa Evans

Have any engagement and communication implications been cleared by Communications?

Yes

Name of Officer: Sarah Silk

Have any localism and Local Member involvement issues been cleared by your Service Contact? Yes

Name of Officer: Emma Fitch

Have any Public Health implications been cleared by Public Health?
Yes

Name of Officer: Kate Parker or Iain Green

8. Source documents

- 8.1 Planning Inspectorate (PINS) National Significant Infrastructure Project (NSIP) Guidance and Advice Notes;

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

NSIP Waste Water Statement;

<https://www.gov.uk/government/publications/national-policy-statement-for-waste-water>

Planning Act 2008 (as amended);

<http://www.legislation.gov.uk/ukpga/2008/29/contents>

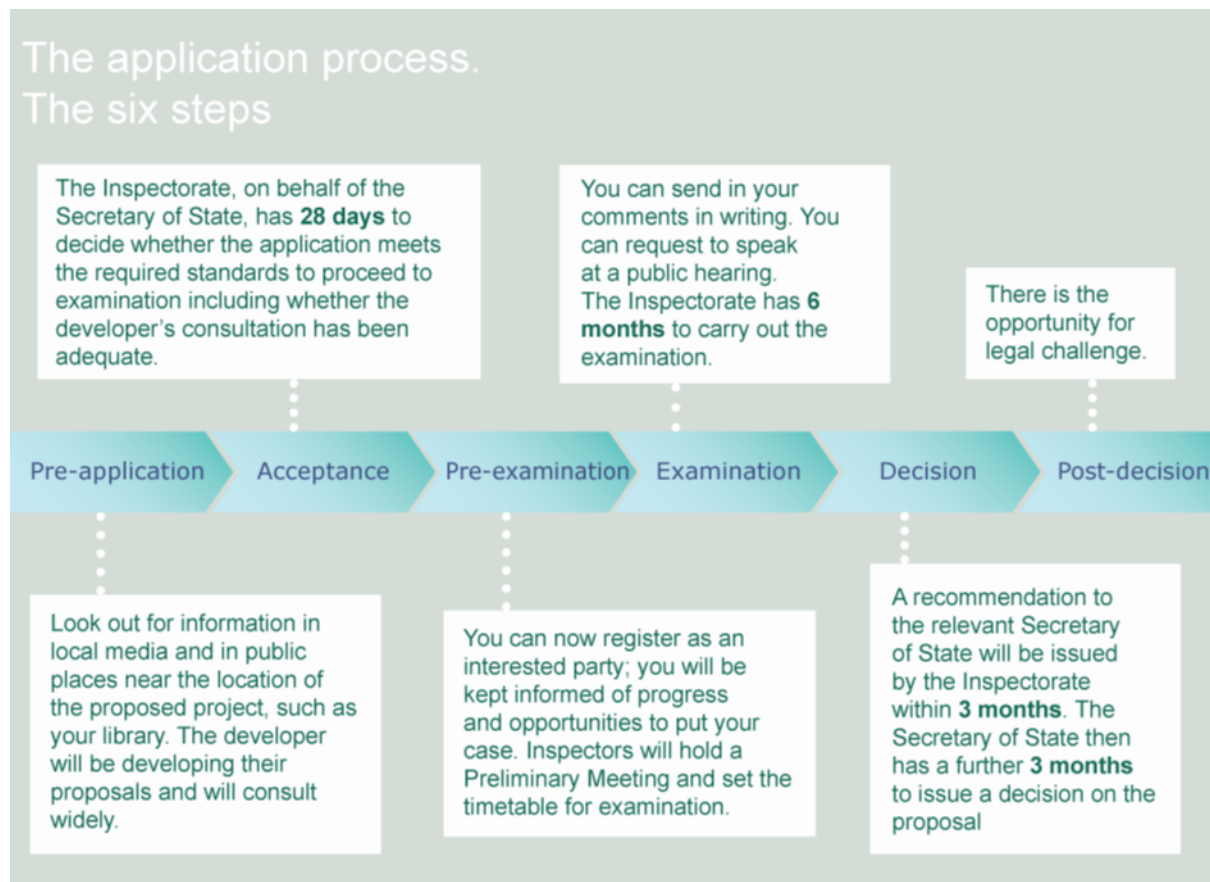
Anglian Water project website;

<https://www.CWWTPR.co.uk/>

The National Planning Policy Framework (NPPF) (2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

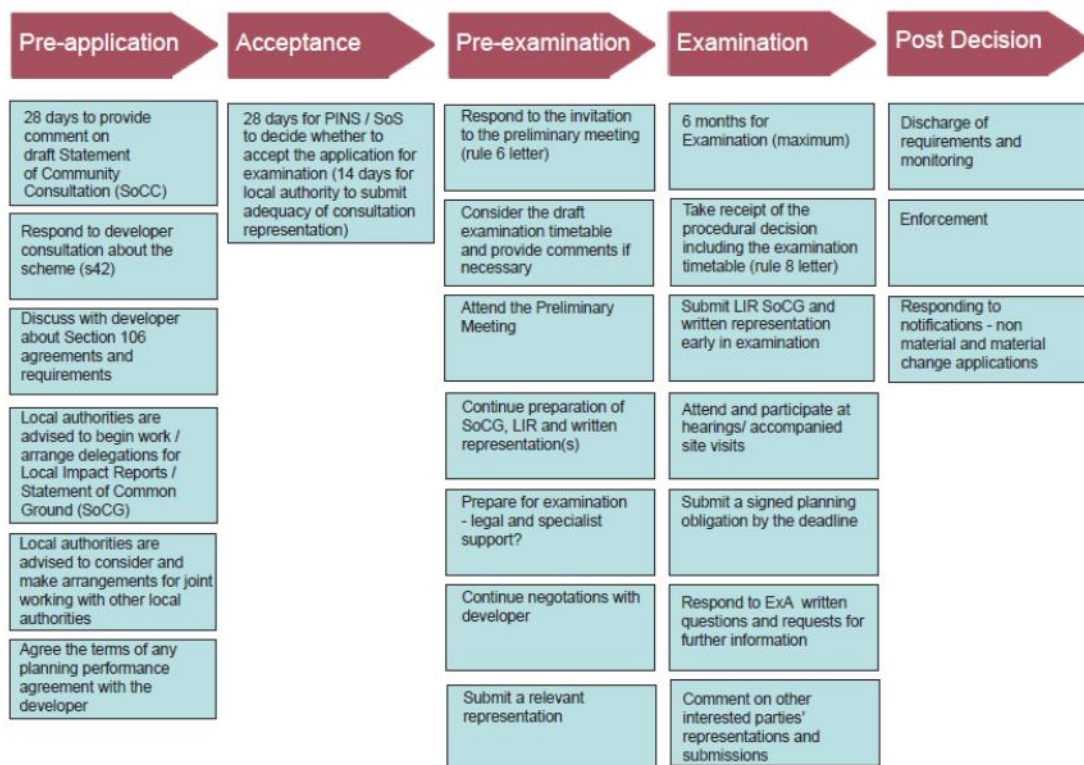
Appendix 1 - The six steps of the NSIP DCO process under the 2008 Act



Source PINS website <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/03/Application-process-diagram2.png>

Appendix 2 - The role of local authorities

The role of local authorities



Source PINS Advice Note 2 https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/03/Advice_note_2.pdf

Appendix 3 Officers Technical Consultation Response

CAMBRIDGE WASTE WATER TREATMENT PLANT RELOCATION PROJECT – PHASE 2 (STATUTORY) PUBLIC CONSULTATION

Thank you for consulting Cambridgeshire County Council. The following should be read in conjunction with previous comments as part of phase 1 consultation that took place in 2020. This is an officers' technical response to the documentation shared as part of the statutory consultation that commenced 23rd June 2021. Please note Members of the Environment and Green Investment Committee will be asked to endorse this response on 16th September. We will notify you should there be any amendments to the response.

Minerals and Waste

A small number of technical reports have been provided including an Odour Factsheet, but a specific policy statement hasn't been provided at this time. It is appreciated and acknowledged that Anglian Water will provide additional information as the application progresses.

The following Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) policies are relevant to this proposal:

- Policy 1: Sustainable development and climate change.
- Policy 5: Mineral Safeguarding Areas (MSAS)
- Policy 10: Waste Management Areas (WMAS)*
- Policy 11: Water Recycling Areas (WRAS)
- Policy 15: Transport Infrastructure Areas (TIAS)*
- Policy 15: Consultations Areas (CAS)*
- Policy 17: Design
- Policy 18: Amenity Considerations
- Policy 20: Biodiversity and Geodiversity
- Policy 21: The Historic Environment
- Policy 22: Flood and Water Management
- Policy 23: Traffic, Highways and Rights of Way
- Policy 24: Sustainable use of soils (Site located on grade 2: good quality agricultural land)
- Cambridge Northern Fringe Aggregates Railhead (TIA)*
- Cowley Road, Cambridgeshire (WMA)*
- Sand and Gravel Minerals Safeguarding Area*
- Cambridge WRC**
- Waterbeach WRC**

* Likely to affect pipelines only; ** Included for completeness only.

It is acknowledged that there will be some overlap with the relevant district council local plan policies.

Please note that the Cambridgeshire and Peterborough Minerals and Waste Local Plan has now been adopted and supersedes the Cambridgeshire and Peterborough Minerals and Waste Core Strategy and Site Specific Proposals documents.

It is recognised that many topics such as heritage and flood risk identified by the policies above have been addressed in the provided documentation. However, the Minerals and Waste Planning Authority requests that Anglian Water provides a table setting out how they have addressed the above policies in forthcoming documentation, cross referencing to other documentation as required. The Minerals and Waste Planning Authority notes the absence of consideration to preserving the quality of soils within the documentation and requests that Anglian Water gives appropriate consideration to this topic, or highlights where this information can be found.

The Minerals and Waste Planning Authority also requests that additional information in relation to the proposed route of the pipelines is provided when available. Anglian Water will need to consider the pipeline proposals in the context of the relevant policies identified above and should clearly state the impact on any safeguarded minerals and waste infrastructure.

Transport

In general and based on the information provided to date the vehicular trips arising from the construction of the treatment plant and consequent operation are low and would not constitute a significant impact on the highway network. However, before Cambridgeshire County Council can agree that position, we would need to have sight of the parameters and factors which informed the trip generation and traffic assignment. We appreciate at this stage in the project more detailed analysis is yet to be completed. However, we would expect to see more information as part of the Transport Assessment. The Traffic and Access Factsheet starts to outline some of content of the Transport Assessment.

Officers have provided pre application advice to Anglian Water giving details of the content of the Transport Assessment. This includes that needed to establish the base line transport conditions and modelling traffic flows. This is to show

- The existing trips in the peak hours and off peak that will be redistributed to the new location, in terms of lorry and non lorry, employee visitor flows.
- The distribution and routes to and from the new site.
- Accident data.
- The impact on the local highway network including the site access junction and the nearest A14 junction. These junctions can be agreed with county and Highways England officers as required when the site access is known.
- Modelling should include committed developments.
- Future years (determined by the Webtag guidance and Cambridgeshire County Council Transport Assessment requirements 2019) to include 5 years post opening.

With regards to the use of surveys, this should be taken at the relevant access points as necessary and agreed with the County Council. These surveys should be undertaken as late as possible as post pandemic traffic flows establish.

Cambridgeshire County Council can provide some model outputs, and in particular models of the A10 /A14 interchange and the A10. Please contact officers for clarification on these in relation to the junctions modelled.

Accident data should be sought from Cambridgeshire County Council Business Intelligence. The accident data should be appended to the Transport Assessment and a plot provided showing each accident location. It would also be beneficial to tabulate the accidents to clearly define the number and severity of accident occurring at each location. The County Council will review the accident analysis once the above information has been provided.

Any mitigation measures should be highlighted in the Transport Assessment, including those relating to non motorised users, as well as any mitigation for traffic as required. We would expect to see high quality cycle parking provided for staff and visitors.

Access Options

Option 1:

Both options 1A and 1B minimise the use of the local highway network. These would require access onto the B1047 to be signalised to allow the traffic generated by the scheme to safely access the adopted public highway. More detail of both junctions' designs, and analysis of their impact on the local highway network is needed to determine the most suitable of these two options.

It is accepted that options 1A and 1B will necessitate some HGV's coming from or going to the east to use A14 J33 to undertake a U-turn. We will expect the Transport Assessment to include further analysis of journeys to and from the new site.

There will be a need for an effective methodology to prevent the traffic generated by the site using the adjacent villages as access routes. This applies to both operation traffic and construction traffic, being the preliminary construction traffic access proposed is similar to option 1A. Details relating to the construction phase need to be included in a Construction Traffic Management Plan. A robust Travel Plan will also be required for staff arriving at the site once operational.

1A

This option uses a short section of the local network and a right turn junction, be this a ghost or full right turn lane, will need to be appropriately assessed.

1B

The difference between this option and Option 1A is the junction arrangement at the top of the east bound offslip. Subject to detailed analysis this arrangement is likely to be a four arm signalised junction. An appropriate assessment of the impact on the highway network is needed.

Option 2:

This is the least preferred route from the perspective of the Local Highway Authority, not only does it require all traffic generated by the site to use Junction 35 which is complex and has nine slight accidents and one serious accident in the last five years (in comparison the Milton Road RAB has had 3 slight accidents in the same period) (source Crash Map UK), but uses a significant length of the local highway network, that is not designated as a commercial vehicle route.

This option seems to be an overly complex design, requiring at least two right hand turn manoeuvres within the local adopted public highway, the use of a road (High Ditch Road) that is at present considered acceptable for use by vehicles in excess of 7.5 tonnes, the realignment of an existing cycle and pedestrian route. Given the alternatives presented, and the volumes of predicted traffic, it is considered that the construction impact of a widened overbridge and a new pedestrian crossing over the A14 to be a sub-optimal solution.

Option 3:

This option considers a new junction off the A14 between J34 and J35. Highways England have advised current policy restricts the construction of new junctions on strategic road of national importance unless there is no clear alternative using existing accesses, it connects with the local road network and is ideally developed through the local plan making process. In this case, alternatives using existing accesses are available and a departure from policy would be required. From a local road perspective, a new junction is likely to create different travel patterns, for vehicles avoiding Newmarket Road, or providing a convenient route to the east of Cambridge. This would be considered undesirable.

Public Rights of Way

Horningsea Public Byway No. 17 (Also known as Fen Ditton Byway No. 14 due to its Moiety status along the parish boundary) provides the middle link between the unclassified carriageway sections of Low Fen Drove. The Byway, which is predominately a gravel track, currently provides access to all modes of travel, including public and private access by motor vehicle. The County Council is aware that the local community have long held concerns regarding the use of Low Fen Drove, including the section of byway, for fly tipping, and other anti-social behaviour.

The Byway forms part of the proposed 3.5km walking loop. Consideration, via an appropriate assessment, should be given to whether it is appropriate to retain public motor vehicular rights along this section of the Byway. The County Council does not express a view at this stage on restricting or removing public motor vehicle rights, but would wish to understand whether all users can be accommodated along the Byway without safety or amenity conflict. If Anglia Water's proposal is to restrict or remove public motor vehicle rights along this byway, then it could propose so within its Development Consent Order (DCO) application.

The County Council supports the proposed bridleway link along the disused railway line linking Low Fen Drove to Station Road, Stow-cum-Quy. The route would provide a well sought after link towards local points of interest such as Quy Fen and Anglesey Abbey as well as into the wider Non-Motorised User network and is supported by the County Council's Rights of Way Improvement Plan (ROWIP).

The north-west section of the 9.5km bridleway loop between The Drove Way (north of Allicky Farm) and Clayhithe Road is indicated along existing public footpaths. No bridleway rights are currently recorded along this section. Further information is therefore required to understand whether the dedication of additional rights are proposed here (see point 6 below).

The non-motorised users network in the immediate vicinity of the site and the inclusion of a variety of loop paths are well presented within the consultation documents. However, it is unclear how users will get to the site in the first instance, and there is concern that users may drive to the site to access the higher quality non motorised user network. The County Council would therefore like to see improvements to connecting routes into local settlement areas. This is particularly relevant to High Ditch Road regardless of which site access option is selected to provide good quality cycle and pedestrian connections into Fen Ditton and the under construction Marleigh development.

All routes, public or permissive should be as inclusive as possible and therefore available to as many users as possible unless there are justifiable reasons in restricting access.

Any proposal to dedicate, downgrade, extinguish or otherwise alter Public Rights of Way should be discussed in detail with the Highway Authority prior to any DCO application. The Highway Authority will require a number of technical details to be included in any DCO to enable it to discharge its duties as Highway Authority (Highways Act 1980) and Surveying Authority (Wildlife and Countryside Act 1981). Omission of these details may result in significant delays with delivery and handover of transport schemes to the Highway Authority and may require supplementary legal agreements to be entered into.

For the walking and cycling infrastructure please also refer to the Greater Cambridge Partnership proposals for the greenway network. Some of these proposals may be in the vicinity of the relocated site.

Ecology

Cambridgeshire County Council welcomes Anglian Water's commitment to deliver at least a 10% increase in biodiversity. However, we ask the scheme to go further. Cambridgeshire is one of the most biodiversity deprived areas in Britain therefore, Local Authority ecologists within Cambridgeshire and Peterborough consider that a 20% uplift in biodiversity value is required to deliver a tangible increase in biodiversity value. We therefore, ask that developers seek to meet this challenge of 20% Biodiversity Net Gain (based on the latest Defra BNG metric) and delivers the 10 Principles of Biodiversity Net Gain (CIEEM 2016).

We welcome Anglian Water's commitment to explore opportunities to maximise value by enabling wider environmental benefits beyond the boundaries of the project, which will give the scheme greater scope to deliver 20% Biodiversity Net Gain and deliver strategic objectives for biodiversity.

Ecology Factsheet

Surveys

The County Council supports the proposed suite of ecological surveys to be carried out as part of the scheme. These should be undertaken during optimal survey seasons and in accordance with industry standards / best practice guidance.

We asked that additional assessment of the River Cam be undertaken to identify any potential for enhancement opportunities either upstream or downstream of the site.

When assessing the level of impact of the scheme on species / habitats, local documents setting out the local status and importance of these species / habitats should be referenced. These include (but not limited to):

- criteria for County Wildlife Sites
- local atlases for species groups (e.g. bird, mammals etc.)
- [priority habitats and Cambridgeshire and Peterborough Additional Habitats of Interest](#)
- [priority species and Cambridgeshire & Peterborough Additional Species of Interest](#)
- [Rare Plants Register](#) and Plant Species of Concern for vice-county 29, as well as the Flora of Cambridgeshire

Aftercare / Management

In order to deliver Biodiversity Net Gain, it will be important for the development to commit to manage the newly created, or enhanced / restored, habitats for a sufficient period of time for the habitat to meet the target condition. This should be delivered as part of the aftercare / landscape and ecological management plan.

A guide to the time it takes for sites to establish their target condition is found within the technical guidance that accompanies the Defra BNG Metric. This timeframe should be utilised when designing the Landscape and Ecological Management Plan, although the actual time take to establish the habitats will depend on the quality of the detailed landscape design (e.g. appropriateness of the scheme to the site condition) and management scheme, and their implementation. It is therefore important that the LEMP includes a comprehensive monitoring scheme to monitor the progress of habitats towards meeting BNG target condition and implement remedial action where required.

Landscape Factsheet

It is important the scheme's design, including the landscape scheme, follows the mitigation hierarchy to avoid impact to ecology (wherever possible) and provide adequate mitigation (if required). Opportunities for enhancement should focus on strategic priorities for the area, as well as build on the habitat and species impacted by the scheme and those important at the location / local area, including:

- [Cambridge Nature Network](#) strategic vision for the area
 - o Site is located within the 'Wicken Fen Vision South' vision of extensive species-rich wildflower grasslands, network of ponds, regenerative farming practices (e.g. hedgerows, field margins and managed for farmland birds such as Turtle Dove), restoration of historic parklands and connection of existing nature conservation sites with a mosaic of wetland and grassland habitats.
- Mitigation and enhancement of the Low Fen Drove Way Grasslands and Hedgerows CWS
 - o expansion of its important grassland habitat into the landscape design, and wider blue-line boundary

- range of habitat to support the complete lifecycle of important invertebrates
- Mitigation and enhancement to the River Cam County Wildlife Site
 - current discharge point into the River Cam (as part of decommissioning works for the existing water treatment plan)
 - at proposed discharge point into the River Cam
 - downstream of the proposed discharge point, such as designed sites (Cam Washes SSSI /CWS)
- Wetland habitats, to complement the River Cam
 - Waterbodies within the landscape design
 - Open channel route for discharge waters from waste treatment plant to River Cam (reedbeds, drainage channels etc)

The current landscape scheme appears to focus on a significant area of woodland (with other habitats also proposed). However, we seek that the proposed landscape scheme be re-assessed to ensure it better reflects the local requirements (as set out above), with a particular focus on species-rich grassland and network of 'water habitats' (e.g. ponds, drains, reedbeds and enhancement to River Cam). Opportunities to help deliver strategic priorities for nature within the applicant's wider land ownership and the local areas should also be explored.

We welcome the inclusion of public access / greenspace at the site, however, the landscape scheme will need to be well designed to ensure sensitive areas for wildlife are adequately protected from negative impacts from visitors.

Sustainability Factsheet: Climate change, net zero and the circular economy

Cambridgeshire County Council welcomes the commitment by Anglian Water to *"ensure that the health of the River Cam is protected and where possible, improved, through ensuring that the current flow to the river from the Cambridge WRC is maintained throughout the new facility's lifecycle"*. We seek that the scheme integrates natural filters through the creation and management of wetlands into the scheme, as Anglian Water have already achieved at their other Water Recycling Centres.

We support Anglian Water's commitment to investigate *"opportunities to see where the water we recycle can add the most value to the surrounding water resources"*, particularly where this can result in the reduction of abstraction from the River Cam County Wildlife Site, which is heavily abstracted, resulting in much reduced flows within the upstream sections that impacts on its biodiversity.

Floods and Water

The proposed site is at low risk of flooding from both pluvial and fluvial sources. Nonetheless, appropriate Sustainable Drainage Systems (SuDS) should be incorporated into the design to ensure the development does not increase the risk of flooding in the surrounding area and elsewhere. The Flood Risk factsheet includes details of SuDS that can be used and we support this. Where possible, green roofs should be incorporated on any flat roofs and water recycling should be considered.

Please note the map titled 'Environment Agency map showing risk of surface water flooding' is incorrect as it actually represents the risk of flooding from rivers and sea.

Archaeology

It is worth noting comments made in response to phase 1 consultation. The site is located in an area of high archaeological potential with substantial evidence for prehistoric and Roman settlement within and in the vicinity of the site. A cropmark complex indicates the location of a Roman settlement within the area, but outside the indicative WWTP footprint (HER MCB13592). The south western extent of this site falls under the A14, the construction of which is likely to have had a substantial impact on the asset. There is high potential for archaeological assets to survive within the proposed WWPT site and transfer corridor.

The proposed discharge corridor passes to the south of Biggin Abbey, a moated site probably constructed in the 13th century (HER MCB1389). The moat is clearly shown on the HER's aerial photograph transcription and the area to south appears to be disturbed, probably by quarrying.

END