

F. Planning assessment

F.1 Planning assessment report

Planning Assessment

CWWTPR
Stage 4 Final Site Selection

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Site Area 1 + 2: Contextual Plan

Site Area 3: Contextual Plan

1. Purpose

- 1.1. To assess the suitability of the shortlisted sites in planning terms having regard to landscape and land use designations, heritage designations and planning policy objectives, surrounding uses, infrastructure capacity and amenity considerations.

2. Criteria and Changes to Assessment from Stage 3

- 2.1. In the previous site selection stages the following planning related matters have been considered as one aspect of the selection criteria:

Stage	Criteria Name	Objectives of Assessment:
Initial Options Appraisal	Impacts on local communities	High-level assessment of key factors such as traffic, odour, noise and visual amenity
Stage 1 – Initial Site Selection	Primary baseline constraints – Environmental and Community	Review of relevant national, regional and local policies to identify the primary constraints including existing residential communities, protected and statutory designated sites, green belt, flood risk areas, landfill sites and watercourses and, using buffers where appropriate, to identify suitable unconstrained areas with potential to limit impacts.
Stage 2 – Course Screening	Planning – Development Constraints and Green Belt	Identification of development constraints having regard to policy (including Green Belt), site allocations and committed development and sensitivity of neighbouring land. Assessment of the potential for environmental and community impacts.
Stage 3 – Fine Screening	Planning - Green Belt and Risk to Aviation	Assessment against Green Belt policy and guidance. Potential impacts on aviation in relation to proximity to Cambridge Airport. More focussed assessment of potential environmental and community impacts.

- 2.2. The conclusion from the previous stages is that only 3 site areas and their connecting infrastructure options are capable of meeting AWS' selection criteria.
- 2.3. For the Stage 4 Final Site Selection, the planning assessment looks at how each site area and corridor option performs against planning policy and considers whether each option is capable of being granted consent in the context of the requirements of national policy taking into account the potential scope for

mitigation (so far as possible at this stage of the project and within the confines of what is needed to deliver CWWTPR).

2.4. For the purposes of an NSIP for waste water¹, relevant planning policy is set out in the National Policy Statement for Waste Water (the 'NPS').

2.5. Part 4 of the NPS sets out policies that are relevant to particular physical impacts of the construction and operation of wastewater NSIPs, under a heading of Generic Impacts. The NPS also provides guidance on what should be included in the applicant's assessment, the principal considerations for decision making, and a framework of possible mitigation measures. This guidance provides a useful framework for the Stage 4 Planning Assessment:

ID	Criteria referenced in the NPS	Para.
1	Impact on Water quality and resources	4.2
2	Odour (quality of life) impacts on amenity of surrounding uses	4.3
3	Flood risk and drainage vulnerability (of the site and its users and from the project)	4.4
4	Impacts on biodiversity and geological conservation and availability of surrounding land for mitigation measures	4.5
5	Coastal change	4.6
6	Landscape and visual impacts (including townscape)	4.7
7	Impact on land use including open space, green infrastructure and Green Belt (openness and purposes)	4.8
8	Noise and vibration Impacts on quality of life including proximity to sensitive surrounding land uses (including quiet places)	4.9
9	Historic environment	4.10
10	Air quality and emissions impacts on health, protected species and habitats and the wider countryside	4.11
11	Potential impacts of dust, artificial light, smoke, steam and insect infestation on premises and locations	4.12
12	Traffic and transport impacts (construction and operation) including suitability and resilience of access route	4.13
13	Waste management	4.14
14	Socio-economic	4.15

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf

- 2.6. With the exception of Criterion 5 (Coastal change) and elements of Criterion 11, most of the matters identified in the above criteria are addressed in the focused assessments undertaken for the Operational, Programme, Economic, Environment and Community assessment criteria, which are covered elsewhere. These, where relevant, identify potential impacts which may arise from the development and their potential significance in the context of each site and its surroundings (for example, on noise sensitive receptors). This planning assessment draws from these but goes further in considering the potential wider planning policy and land use impacts of development under each option.
- 2.7. In respect of Criterion 5 (Coastal change), this is considered to be neutral for site assessment purposes since none of the site options are located in an area at risk from coastal change. For Criterion 11, potential impacts from dust on premises and locations are covered in the air quality and emissions assessment. Impacts from artificial light are considered as part of the landscape and visual impact assessment and biodiversity assessment. Impacts from smoke, steam and insect infestation are considered to be low and for the purposes of this assessment are considered equal to each site.
- 2.8. The only NPS criterion which remains to be assessed outside the Operational, Programme, Economic, Environment and Community assessment criteria, therefore, is NPS criterion 7 'impact on land use'. Before assessing how each site option performs overall against planning policy and the extent to which each option is capable of being granted consent in the context of the requirements of national policy, therefore, an assessment of each option against NPS criterion 7 'land use impacts' is first required.

3. Impact on Land Use (NPS Criterion 7) Site Options Assessment

- 3.1. Assessment of each site area and corridor option under NPS criterion 7 is addressed in this Planning Assessment having regard to the following matters:
- I. Policy designations
 - II. Description of surrounding land uses and activities
 - III. Function and value of each site in land use terms (including Green Belt)

IV. Potential impacts of CWWTPR development on

- Green Belt purposes
- Other policy designations
- Surrounding land uses (existing, committed and proposed)

3.2. The statutory development plan for South Cambridgeshire comprises the South Cambridgeshire Local Plan 2018, the Cambridgeshire and Peterborough Minerals and Waste Core Strategy 2011 and the Cambridgeshire and Peterborough Site Specific Proposals Plan 2012. Supplementary Planning Documents (SPDs) provide guidance in some policy areas to support the adopted Local Plan (2018). Other Strategy documents have also been locally adopted including the Cambridgeshire Green Infrastructure Strategy June 2011 and the Cambridge Nature Conservation Strategy 2006.

3.3. Overarching non site-specific policies within the Local Plan 2018 relevant to all three site areas and the associated tunnel and pipeline corridor options include, but are not limited to:

- Policy S/3 - Presumption in Favour of Sustainable Development
- Policy S/4 - Cambridge Green Belt
- Policy S/6 – The Development Strategy to 2031
- Policy CC/1 - Mitigation and Adaptation to Climate Change
- Policy HQ/1 - Design Principles
- Policy NH/2 - Protecting and Enhancing Landscape Character
- Policy NH/3 - Protecting Agricultural Land
- Policy NH/4 - Biodiversity
- Policy NH/6 - Green Infrastructure
- Policy NH/8 - Mitigating the Impact of Development in and adjoining the Green Belt
- Policy NH/11 - Protected Village Amenity Areas
- Policy NH/14 - Heritage Assets
- Policy SC/12 - Air Quality
- Policy SC/14 - Odour and Other Fugitive Emissions to Air

3.4. Policies within the Minerals and Waste Core Strategy (2011) relevant to all three site areas and the associated tunnel and pipeline corridor options include, but are not limited to:

- Policy CS17 - Waste Water Treatment Works
- Policy CS22 - Climate Change
- Policy CS26 - Mineral Safeguarding Areas
- Policy CS33 - Protection of Landscape Character
- Policy CS35 - Biodiversity and Geodiversity
- Policy CS36 - Archaeology and the Historic Environment
- Policy CS37 - Public Rights of Way
- Policy CS39 - Water Resources and Water Pollution Prevention

3.5. Site specific policy designations relevant to the three relocation options and/or tunnel and pipeline corridor options are referred to where appropriate in the planning appraisals of each site area below.

3.6. Given the need for planning judgement in the assessment of each site area option, and limited site-specific design details at this stage in the development process, the use of a RAG evaluation for planning assessment purposes at this latest stage of site selection is considered inappropriate and incapable of providing sufficient granularity to distinguish between sites. Given this, each site area option is assessed independently, and comparison between site options is considered in the main report in the overall assessment and final site selection.

4. Option Assessments

Site Area and Options 1A and 1B

I. Policy designations

4.1. None of the land encompassed by site area 1 is specifically allocated for development. However, site area 1 is situated within the Cambridge Green Belt and SCLP Policy SP/4 states that new development in the Green Belt will only be permitted in accordance with national Green Belt policy. Save in respect of the potential development of a new pumping station and its immediate connecting infrastructure at Waterbeach

(beyond the outer boundary of the Cambridge Green Belt), site area 1 and the connection corridor options 1A and 1B involve development in the Green Belt. The NPS is clear that the general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them². Such development should not be approved except in very special circumstances. “Very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”.

4.2. Other site-specific designations affecting Options 1A and 1B are:

- Waste Consultation Area – This designation affects the ‘waste water transfer tunnel corridor’ and ‘treated effluent tunnel/pipeline corridor’ for both Options 1A and 1B. It may also affect the ‘diversions for existing waste water transfer network’ for both Options 1A and 1B. This designation is not, however, considered determinative for site option selection purposes.
- Mineral Safeguarding Areas (Sand and Gravel) - This designation affects the ‘diversions for existing waste water transfer network’, ‘treated effluent tunnel/pipeline corridor’, ‘Waterbeach transfer corridor’, and ‘site access area’ for Options 1A and 1B.
- Conservation Area - This designation may affect the ‘Waterbeach transfer pipeline corridor’ for both Options 1A and 1B at points being within 100m of the Landbeach Conservation Area. The ‘treated effluent tunnel/pipeline corridor’ for Option 1B is also at points within 150m of the Milton Conservation Area. As all pipeline/tunnel corridors would be underground, through either ‘cut and cover’ or ‘directional drilling’, it is considered unlikely that they will materially affect the setting of this designation long-term, although a temporary impact may occur.
- Protected Village Amenity Area - The ‘treated effluent tunnel/pipeline corridor’ and ‘waste water transfer tunnel corridor’ for both Options 1A and 1B could directly impact on this designation. As all pipeline/tunnel corridors would be underground, through either ‘cut and fill’ or ‘directional drilling’, it is considered unlikely that they will materially affect this designation long-term, although a temporary impact may occur.

² NPS paragraph 4.8.10

II. Description of surrounding land uses and activities and their sensitivity

Planning History and Other Projects

- 4.3. A review of the South Cambridgeshire District Council and Cambridgeshire County Council publicly available planning records has been undertaken (supplemented by a search of local social media channels) to identify any extant planning permissions, current applications or other development projects currently being promoted which, directly or indirectly, could affect or be affected by the development of site area 1 and tunnel and pipeline corridor options.
- 4.4. The 'Waterbeach transfer corridor' for site area 1 could directly affect or be affected by the development of Waterbeach new town, a development comprising a combined 11,000 new homes to the north of Waterbeach. However, this risk is capable of being avoided by careful localised routing in consultation with the developers of Waterbeach new town.
- 4.5. Other known planning applications or projects are:
- The Cambridge Autonomous Metro – This is a project being pursued by the Mayor. The route from Cambridge North to Waterbeach has yet to be resolved. The precise form of transport and vehicle have also yet to be determined which will also affect the routeing to Waterbeach. The CAM network will comprise both tunnelled and surface elements and will be delivered over the next decade. If forthcoming, this proposal could directly affect the 'treated effluent tunnel/pipeline corridor' and 'waste water transfer tunnel corridor' for Options 1A and 1B, although as all pipeline/tunnel corridors would be underground, through either 'cut and cover' or 'directional drilling', it is considered unlikely that these schemes would be mutually exclusive. The project is not at this stage committed nor any funding confirmed. In this circumstance, these proposals currently have no weight in planning terms and are not determinative in this assessment.
 - Waterbeach to Cambridge Better Public Transport and Active Travel project – This is one of four corridor projects around Cambridge that aims to provide better public transport and active travel routes, such as walking and cycling, offering better connections and alternatives to car use between Waterbeach and Cambridge. The ongoing study seeks to identify a preferred transit route corridor to

integrate with the emerging Cambridge Autonomous Metro (CAM) proposals and to enhance walking and cycling infrastructure. The intention is to progress a Waterbeach to North East Cambridge Public Transport Scheme along this preferred corridor. Funding of £8m was committed in February 2020 by the Greater Cambridge Partnership. It is intended that the route would be completed in the period 2025-2028. Four corridor options have been put forward as part of a public consultation exercise running between 19 October and 14 December 2020. The 'West Area of Interest' option encompasses site area 1. The other route options could directly affect the 'treated effluent tunnel/pipeline corridor' and 'waste water transfer tunnel corridor' for Options 1A and 1B, although as all pipeline/tunnel corridors would be underground, through either 'cut and cover' or 'directional drilling', it is considered unlikely that these schemes would be mutually exclusive.

- **A10 Upgrade** - A funding application for duelling the A10 was submitted by the Mayor and the Combined Authority in August 2019. A consultation exercise on this upgrade was undertaken in June/July 2020. If forthcoming, this proposal could directly affect the 'treated effluent tunnel/pipeline corridor', 'waste water transfer tunnel corridor', 'Waterbeach transfer corridor', and 'site access area' for Options 1A and 1B. As details are not yet finalised the full impact is unclear. The Greater Cambridge Partnership has also recently established an A14 junction 33 working group looking at the suitability of the junction for the growing needs of the area.
- **Police Accommodation** - A planning application has been submitted for operational police accommodation and ancillary functions at land off Butt Lane south of the existing park and ride site. The 'treated effluent tunnel/pipeline corridor' and 'waste water transfer tunnel corridor' for Option 1A and the 'waste water transfer tunnel corridor' for Option 1B cross this site. If planning permission is granted for the current application and development proceeds, this may have implications on the corridors.
- **Cambridge Rowing Lakes** - An outline planning application was submitted in 2006 by the Cambridge Sport Lakes Trust for the proposed Cambridge Rowing Lakes. It was approved in 2013. Being an outline application, reserved matters had to be submitted by 2018. The Trust submitted the reserved matters application in 2018 but their EIA was based on survey data going back to 2005/6 and so the application was withdrawn. It is understood the Trust are still seeking to promote the project. If forthcoming, this project could directly affect the 'treated effluent tunnel/pipeline corridor' and 'waste

water transfer tunnel corridor' for Site 1 Options A and B. These proposals currently have no weight in planning terms and are not determinative in this assessment.

- As part of the Greater Cambridge Local Plan Call for Sites three sites have been promoted to the north of Milton for employment and residential development. None of the submissions under this call for sites has any planning weight at the time of writing. However, these have the potential to affect the discharge corridor route to the River Cam if they are allocated.
- Land comprising Rectory Farm has also been promoted on behalf of Gonville & Caius College for commercial development. This proposal directly affects a significant portion of the eastern part of site area 1 and may affect the diversion for the existing waste water transfer network.
- Chivers Farms Ltd has submitted a site for commercial use to the west of site area 1. Further sites have been promoted to the south west of site area 1 for residential development and to the south of Waterbeach for commercial development which has the potential to affect the Waterbeach main route. There are also a number of small sites around Landbeach that have been submitted for residential use which may also affect the Waterbeach main route.
- Trinity College Cambridge has also promoted a large site to the south of Butt Lane for substantial commercial development comprising the extension of the Cambridge Science Park which may affect the diversion for the existing waste water transfer network.

4.6. The location of the site area relative to surrounding land uses and these most relevant proposals are shown on the attached plan "Site Area 1 + 2: Contextual Plan". The plan only identifies the potential site area for the WWTP. Pipeline and tunnel route corridors are identified elsewhere in this report on Mott MacDonald drawings.

Other Land Uses and Activities

4.7. Identified land uses and activities surrounding the site are as follows:

- Horticultural - A fruit farm is located immediately adjacent the south of site area 1. It is potentially likely to be directly affected by development of site area 1. It could also be directly affected by the 'treated effluent tunnel/pipeline corridor' and 'waste water transfer tunnel corridor' for Option 1A, and

the 'waste water transfer tunnel corridor' for Option 1B. It could also affect the 'site access area' for Options 1A and 1B. Acquisition of the required land for these options has the potential to significantly impact (including potentially distinguishing) the fruit farm business at site area 1. There are a number of mobile homes on the fruit farm site which are understood to accommodate temporary seasonal workers. The planning status of these mobile homes is unclear, but the amenity of their occupiers would potentially be directly affected by development of site area 1.

- Residential - Cambridge's main built-up area is located approximately 1.87km to the south; the village of Milton is located approximately 450m to the south-east; the village of Impington is located approximately 850m to the south-west; and the village of Landbeach is located approximately 500m to the north east. There are also a number of isolated dwellings along Butt Lane/ Milton Road. There are 144 properties within 1km of the centre point of site area 1. The settlements would not be directly affected by development of site area 1 but could be affected by the 'treated effluent tunnel/pipeline corridor', 'waste water transfer tunnel corridor', and 'diversions for existing waste water transfer network' for Option 1A, and the 'waste water transfer tunnel corridor' and 'diversions for existing waste water transfer network' for Option 1B. They could also be affected by the 'site access area' for Options 1A and 1B. There is potential for moderate harm to the residential amenity of occupiers, both temporarily during construction and during operation.
- Open Space and Green Infrastructure – site area 1 lies within an area of open countryside and is surrounded by a network of public rights of way which together have value as a form of green infrastructure. There are no accessible open spaces immediately in the vicinity of site area 1, but Milton Cemetery and Milton Maize Maze are likely to experience a temporary reduction in amenity due their proximity to a number of the components of the ancillary infrastructure associated with Option 1A. Cambridge FootGolf Centre is located 700m to the east. It would not be directly affected by the relocation; however, it could be directly affected by the 'treated effluent tunnel/pipeline corridor' for Option 1B. The 'treated effluent tunnel/pipeline corridor' and 'waste water transfer tunnel corridor' for both Options 1A and 1B could directly impact on a Protected Village Amenity Area at Milton. As all pipeline/tunnel corridors would be underground, through either 'cut and cover' or 'directional drilling', it is considered unlikely that they will materially affect these uses long-term, although a temporary impact may occur.

- **Public Right of Way** - A public right of way (PRoW) in the form of a 'byway - open to all traffic' crosses site area 1 north to south ('Mere Way'). It constitutes a former Roman road. Works to encourage greater use of Mere Way are being prepared as part of a Section 106 undertaking given in the planning permission for Waterbeach new town. This route would be directly affected physically (at least temporarily) and in amenity terms by proximity to site area 1 and by 'diversions for existing waste water transfer network' for Options 1A and 1B. As all pipeline/tunnel corridors would be underground, through either 'cut and cover' or 'directional drilling', it is considered unlikely that they will materially affect this use long-term, although a temporary impact may occur. Site area 1 is large enough for development of the CWWTPR to avoid the need for diversion of this byway, but there will be loss of amenity to users of the byway from the proximity of the new WWTP and possible need for crossing of the route for vehicle access.
- **Heritage** - There are areas of Scheduled Ancient Monument to the north-east of Landbeach and the north-east of Milton which could potentially be impacted directly by the 'Waterbeach transfer pipeline corridor' for Options 1A and 1B, and the 'treated effluent tunnel/pipeline corridor' for Option 1B. These sites and the surrounding area may contain important archaeological remains. As all pipeline/tunnel corridors would be underground, through either 'cut and cover' or 'directional drilling', a direct impact may occur but is unlikely to be permanent or significant. Site area 1 straddles Mere Way which is formed from an old Roman Road which is an undesignated heritage asset which must be considered in any heritage assessment. Potential for archaeological remains is high but may be capable of avoidance or mitigation.
- **Landfill** - Site area 1 is located approximately 500m to the north of Milton Landfill, which is unlikely to be directly affected by development.
- **Commercial** - A business park is located approximately 500m to the south. It is unlikely to be directly affected by relocation to site area 1, although there is a likelihood of potential disturbance from traffic and (temporary) construction works.

III. Function and value of site in land use terms (including Green Belt)

4.8. Site area 1 comprises primarily agricultural land with a small element of woodland at its western end. All of this land is classified as grade 2 or 3 best and most versatile agricultural land. NPS paragraph 4.8.8 states that Applicants should seek to minimise impacts on the best and most versatile agricultural land, and preferably use land in areas of poorer quality. Save as referred to above, particularly in respect of its situation within the Cambridge Green Belt, there are no other specific planning policy designations relating to site area 1 itself nor the connection corridors. Although there is existing transport infrastructure and other development to the south, site area 1 is located in an exposed area of open countryside which presently provides a strong visual separation between the surrounding settlements of Landbeach, Milton and Impington/Histon..

4.9. The Green Belt Study prepared by Mott MacDonald dated August 2020 considers the overall site performance of each site area (sites areas 1, 2 and 3) against Green Belt purposes. For site area 1 the report states that:

“The presence of the transport and other large infrastructure north of the A14 has extended built development associated with the northern boundary of Cambridge into the farmed landscape around site area 1. This development has encroached on the countryside. The landscape around site area 1, however, still provides a clear separation between Milton, Landbeach, Histon and Impington and a setting for the villages which are partly in conservation area. It does not contribute to the historic setting of Cambridge owing to severance caused by the A14 and the urban character of the approaches to the city from the north. Site area 1 is not currently derelict or urban land.” It goes on to conclude that this site has a ‘Fair’ performance in relation to Green Belt purposes overall.

IV. Potential impacts of CWWTPR development on

- Green Belt purposes
- Other policy designations
- Surrounding land uses (existing, committed and proposed)

- 4.10. The Green Belt Study prepared by Mott MacDonald dated August 2020 considers the potential overall scale of impact from development. For site area 1 it states that:

“Development on site area 1, in a landscape of low sensitivity, would extend the existing developed area south of Butt Lane into open farmland and consequently reduce the openness of the Green Belt in this location. It would detract from the setting of Landbeach and would narrow the landscape gap between Milton and Landbeach. The development would have little effect on the landscape setting of Cambridge. It would be a prominent feature in the open landscape, visible from properties along High Street, Landbeach, from isolated properties near the site, and from the PRow along Mere Way.”

- 4.11. If this site is developed, it is considered that the Green Belt would be harmed by the erosion of separation between the settlements of Impington / Histon and Landbeach. There would also be a loss of openness. Whilst further development pressure may be lessened by the presence of the new CWWTP, the visual separation between Milton and Impington in views from the north (in which development on site area 1 will be particularly prominent) would be largely lost. The purposes of the Green Belt at a local level would be compromised by this development although the wider purposes of preserving Cambridge and its setting would remain unaffected.

- 4.12. In planning policy terms, development of this site for CWWTPR will represent inappropriate development within the Green Belt and will impact directly on the adjoining fruit farm business. Actual harm to Green Belt may partially be tempered by the present somewhat compromised performance of this area in Green Belt purpose terms.

- 4.13. Site area 1 may potentially be affected by the proposed improvements to the A10 although studies are still at optioneering stage (Option D directly impacts the site area). The connection corridor from Waterbeach may be affected by the planning permission for the new Waterbeach New Town. The corridor route back to the existing treatment works crosses a protected village amenity area at Milton. In both instances, given that the works at these points will be underground, disturbance is likely to be limited and temporary and not likely to conflict per se with policy.

- 4.14. The development will be highly visible in the landscape and from surrounding properties (particularly in Landbeach) and will require significant landscape mitigation. Proximity of more sensitive land uses, even

with the separation distance allowed in the site selection process, is likely to give rise to amenity concerns and could result in complaints. Traffic generated by the development should be contained on Butt Lane and the A10 but will need to utilize the congested A10/A14 junction and may be subject to (at very least) temporary disruption if the network infrastructure projects referenced above are progressed. In the event that development of any of the sites in the immediate vicinity of site area 1 promoted in the recent call for sites is realised, is likely to have a direct impact the long-term resilience of CWWTPR. Site area 1 sits on a potential future transport corridor and the eastern part of it is being promoted for commercial development through the emerging Greater Cambridge Local Plan process. At this time, this proposal has no planning weight. However, overlaying site area 1 with this promotion land and accounting for the asset encroachment/safeguarding area, development of a new WWTP here could therefore impede the future strategic growth of Cambridge by prejudicing or at worse obstructing other infrastructure and alternative economic development proposals. The risk of encroachment of other development proposals on the area in the future may potentially give rise to operational conflicts such as odour or traffic.

- 4.15. The characteristics and proximity of site area 1 to Milton and Landbeach, given surrounding development and the promotion of additional infrastructure and development in the vicinity, restricts the opportunities for this site area to deliver new habitat and improved connectivity.
- 4.16. The corridor for the wastewater transfer tunnel for both Options 1A and 1B crosses a protected village amenity area at the southern end of Milton village. SCLP Policy NH/11 states that development will not be permitted within or adjacent to these areas if it would have an adverse impact on the character, amenity, tranquillity or function of the village. However, as the wastewater transfer tunnel would be underground and directionally drilled, it is considered unlikely that it would materially affect this designation permanently.
- 4.17. The transfer corridors are also affected by the waste safeguarding areas defined by Minerals and Waste Policy SSPW8. It is considered that the transfer corridors would not adversely affect the existing waste facilities and therefore this designation is unlikely to preclude the development of site area 1. The discharge pipeline routes run close to or beneath the River Cam Wildlife site and the Milton Road Hedgerow Wildlife site. However, any effects are likely to be temporary due to the depth of the pipeline routes.

- 4.18. Although the government has said that net gain requirements will not be made mandatory for NSIPs under the upcoming Environment Bill, biodiversity net gain and the potential for schemes to deliver and contribute to biodiversity net gain is capable of being an 'important and relevant matter' as part of the DCO determination process. It is Anglian Water's intention (as referenced in the Statement of Requirements and Operational Assessment – Appendix D.1) to deliver biodiversity net gain on this site in relation to additional habitat creation.
- 4.19. The Cambridgeshire Green Infrastructure Strategy 2011 sets out strategic aims and objectives for Cambridge and the wider area. Appendix 7 identifies opportunities for Green Infrastructure Gateways where people can move from urban to rural areas via public routes. Milton Country Park is identified as a Green Infrastructure Destination. Figure 7.12 identifies the Combined Gateway opportunities which includes the whole area north of Cambridge. There is opportunity to improve the green infrastructure around Mere Way.
- 4.20. The Wildlife Trust is also promoting Nature Recovery Network areas across the county. CWWTPR may offer opportunity to improve the River Cam corridor as part of this scheme, although the scope for improvement is likely to be limited to financial contributions given AWS's lack of land ownership in this corridor.
- 4.21. The development of this site area option may result in the partial loss or total extinguishment of the existing fruit farm business that operates in this location.
- 4.22. In terms of impact on conservation areas, the transfer corridors (as well as being underground) are sufficiently distant to not directly affect them. Their potential impact is not considered to weigh against site area 1 in heritage terms.

5. Site Area 2 and Options 2A and 2B

I. Policy designations

- 5.1. None of the land encompassed by site area 2 is specifically allocated for development. However, site area 2 is situated within the Cambridge Green Belt and SCLP Policy SP/4 states that new development in the

Green Belt will only be permitted in accordance with national Green Belt policy. Save in respect of the potential development of a new pumping station and its immediate connecting infrastructure at Waterbeach (beyond the outer boundary of the Cambridge Green Belt), site area 2 and the connection corridor options 2A and 2B involve development in the Green Belt. The NPS is clear that the general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them³. Such development should not be approved except in very special circumstances. “Very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”.

5.2. Other site-specific designations affecting Options 2A and 2B are:

- Waste Consultation Area – This designation directly affects site area 2. It also affects the ‘waste water transfer tunnel corridor’ and ‘treated effluent tunnel/pipeline corridor’ for Options 2A and 2B. It may also affect the ‘diversions for existing waste water transfer network’ for Options 2A and 2B. This designation is not, however, considered determinative for site option selection purposes.
- Mineral Safeguarding Areas (Sand and Gravel) - This designation may partially affect site area 2. It also affects the ‘diversions for existing waste water transfer network’, ‘treated effluent tunnel/pipeline corridor’, ‘Waterbeach transfer corridor’, and ‘site access area’ for Options 2A and 2B.
- Conservation Area - This designation may affect the ‘Waterbeach transfer pipeline corridor’ for Options 2A and 2B, at points being within 100m of the Landbeach Conservation Area. The ‘treated effluent tunnel/pipeline corridor’ for Option 2B is at points within 150m of the Milton Conservation Area. As all pipeline/tunnel corridors would be underground, through either ‘cut and cover’ or ‘directional drilling’, it is considered unlikely that they will materially affect the setting of this designation long-term, although a temporary impact may occur.
- Protected Village Amenity Area - This designation could directly affect the ‘treated effluent tunnel/pipeline corridor’ and ‘waste water transfer tunnel corridor’ for Options 2A and 2B. As all pipeline/tunnel corridors would be underground, through either ‘cut and cover’ or ‘directional drilling’,

³ NPS paragraph 4.8.10

it is considered unlikely that they will materially affect this designation long-term, although a temporary impact may occur.

II. Description of surrounding land uses and activities and their sensitivity

Planning History and Other Projects

- 5.3. A review of the South Cambridgeshire District Council and Cambridgeshire County Council publicly available planning records has been undertaken (supplemented by a search of local social media channels) to identify any extant planning permissions, current applications or other development projects currently being promoted which, directly or indirectly, could affect or be affected by the development of site area 2 and tunnel and pipeline corridor options.
- 5.4. The 'Waterbeach transfer corridor' for site area 2 could directly affect or be affected by the development of Waterbeach new town, a development comprising a combined 11,000 new homes to the north of Waterbeach. However, this risk is capable of being avoided by careful localised routing in consultation with the developers of Waterbeach new town.
- 5.5. Other known planning applications or projects are:
- Cambridge Science Park – Proposals for an extension to the Cambridge Science Park⁴ within the Green Belt north of the A14 have been promoted by the landowner (Trinity College, Cambridge) in representations to the early stages of the preparation of the Greater Cambridge Local Plan. These proposals currently have no weight in planning terms and are not by themselves determinative in this assessment. This situation is unlikely to change unless and until planning permission is granted or the site is proposed for allocation in the Preferred Options version of the Greater Cambridge Local Plan which is due to be published in Summer 2021. Both scenarios are considered to be unlikely at this time, but the proposals are considered to be a credible promotion by a strategic landowner (Trinity College Cambridge) compatible with growth aspirations for Greater Cambridge for technology related development and the Government's growth prospectus for the OxCam Arc "key economic

⁴ <https://www.cambridgesciencepark.co.uk/cambridge-science-park-north/>

priority” area.. In the event that the landowner’s proposals are supported by the local planning authority, they could be prejudiced by the development of site area 2 and the ‘diversions for existing waste water transfer network’ for Options 2A and 2B, with the effect that the new WWTP here could impede the future strategic growth of Cambridge by prejudicing or at worse obstructing alternative economic development proposals.

- Land at Milton Road, Impington - An outline planning application with all matters reserved, other than access, for the development of up to 50 residential dwellings and a Community Park was made in April 2019 on land off Milton Road to the north of St Andrews Way in Impington. This application was withdrawn in August 2019 has now been promoted in the recent Greater Cambridge Local Plan Call for Sites for residential development which, if allocated and brought forward could affect the ‘Waterbeach transfer pipeline corridor’ for Options 2A and 2B.
- The Cambridge Autonomous Metro - If forthcoming, this proposal could directly affect the ‘treated effluent tunnel/pipeline corridor’ and ‘waste water transfer tunnel corridor’ for Options 2A and 2B. The project is not at this stage committed nor any funding confirmed. In this circumstance, these proposals currently have no weight in planning terms and are not determinative in this assessment.
- Waterbeach to Cambridge Better Public Transport and Active Travel project – This is one of four corridor projects around Cambridge that aims to provide better public transport and active travel routes, such as walking and cycling, offering better connections and alternatives to car use between Waterbeach and Cambridge. The ongoing study seeks to identify a preferred transit route corridor to integrate with the emerging Cambridge Autonomous Metro (CAM) proposals and to enhance walking and cycling infrastructure. The intention is to progress a Waterbeach to North East Cambridge Public Transport Scheme along this preferred corridor. Funding of £8m was committed in February 2020 by the Greater Cambridge Partnership. It is intended that the route would be completed in the period 2025-2028. Four corridor options have been put forward as part of a public consultation exercise running between 19 October and 14 December 2020. The ‘West Area of Interest’ option encompasses site area 2. The other route options could directly affect the ‘treated effluent tunnel/pipeline corridor’ and ‘waste water transfer tunnel corridor’ for Options 2A and 2B, although as all pipeline/tunnel corridors would be underground, through either ‘cut and cover’ or ‘directional drilling’, it is considered unlikely that these schemes would be mutually exclusive.

- A10 Upgrade - A funding application for duelling the A10 was submitted by the Mayor and the Combined Authority in August 2019. A consultation exercise on this upgrade was undertaken in June/July 2020. If forthcoming, this proposal could directly affect the 'treated effluent tunnel/pipeline corridor', 'waste water transfer tunnel corridor', 'Waterbeach transfer corridor', and 'site access area' for Options 2A and 2B. As details are not yet finalised the full impact is unclear. The Greater Cambridge Partnership has also recently established an A14 junction 33 working group looking at the suitability of the junction for the growing needs of the area.
- Police Accommodation - A planning application has been submitted for operational police accommodation and ancillary functions at land off Butt Lane south of the existing park and ride site. The 'treated effluent tunnel/pipeline corridor' and 'waste water transfer tunnel corridor' for Option 2A and the 'waste water transfer tunnel corridor' for Option 2B cross this site. If planning permission is granted for the current application and development proceeds, this may have implications on the corridors.
- Cambridge Rowing Lakes - An outline planning application was submitted in 2006 by the Cambridge Sport Lakes Trust for the proposed Cambridge Rowing Lakes. It was approved in 2013. Being an outline application, reserved matters had to be submitted by 2018. The Trust submitted the reserved matters application in 2018 but their EIA was based on survey data going back to 2005/6 and so the application was withdrawn. It is understood the Trust are still seeking to promote the project. If forthcoming, this project could directly affect the 'treated effluent tunnel/pipeline corridor' and 'waste water transfer tunnel corridor' for Options 2A and 2B. These proposals currently have no weight in planning terms and are not determinative in this assessment.
- As part of the Greater Cambridge Local Plan Call for Sites three sites have been promoted to the north of Milton for employment and residential. None of the submissions under this call for sites has any planning weight at the time of writing. However, these have the potential to affect the discharge corridor route to the River Cam if they are allocated.
- A further site has been promoted to the south of Waterbeach for commercial development which has the potential to affect the Waterbeach main route. There are also a number of small sites around Landbeach that have been submitted for residential use which may also affect the Waterbeach main route.

- A site proposed for residential use has also been promoted south of Milton and north of the A14 which could affect the wastewater transfer tunnel corridor and the discharge to the River Cam.

5.6. The location of the site area relative to surrounding land uses and these most relevant proposals are shown on the attached plan “Site Area 1 + 2: Contextual Plan”. The plan only identifies the potential site area for the WWTP. Pipeline and tunnel route corridors are identified elsewhere in this report on Mott MacDonald drawings.

Other Land Uses and Activities

5.7. This section considers uses and activities surrounding the site. Land uses and activities include:

- Landfill – Site area 2 is located immediately adjacent to Milton Landfill which borders the western boundary. It is unlikely to be directly affected by the relocation. Landfill is due to be completed by 31 December 2026 at the latest. The site is then to be restored to agricultural use over the capped landfill. The gas system should not interfere with the agricultural use.
- Commercial - A business park is located to the immediate north. It would not be directly affected by development of site area 2, however it could be directly affected by the ‘treated effluent tunnel/pipeline corridor’, ‘waste water transfer tunnel corridor’, and ‘diversions for existing waste water transfer network’ for Option 2A and 2B. It could also be affected by the ‘site access area’ for Options 2A and 2B. Impacts from construction and operation of site area 2 have the potential to disrupt occupiers of the business park.
- Horticultural - A fruit farm is located to the north of Butt Lane approximately 360m to the north of site area 2. The business is unlikely to be directly affected by development of site area 2, but could suffer temporary disruption from construction of the ‘treated effluent tunnel/pipeline corridor’, ‘waste water transfer tunnel corridor’, and ‘diversions for existing waste water transfer network’ for Options 2A and 2B.
- Residential - Cambridge’s main built-up area is located approximately 500m to the south; the village of Milton is located approximately 900m to the east; the village of Impington is located approximately 400m to the west; and the village of Landbeach is located approximately 1.8km to the north east. There are also a number of isolated dwellings along Butt Lane/ Milton Road. There are also a number

of isolated dwellings along Butt Lane/ Milton Road. There are 163 properties within 1km of the centre point of Site area 2. The settlements would not be directly affected by development of site area 2, however they could be directly affected by the 'treated effluent tunnel/pipeline corridor', 'waste water transfer tunnel corridor', and 'diversions for existing waste water transfer network' for Options 2A and 2B. A gypsy/traveller site is located approximately 400m to the south of site area 2. There is potential for moderate harm to the residential amenity of occupiers, both temporarily during construction and during operation.

- **Open Space and Green Infrastructure** – Site area 2 lies within an area of open countryside and is surrounded by a network of public rights of way which together have value as a form of green infrastructure, albeit disturbed by various forms of existing development and activities. There are no accessible open spaces immediately in the vicinity of site area 2, but Milton Cemetery is likely to experience a temporary reduction in amenity due its proximity to site area 2. The Cambridge FootGolf Centre could be directly affected by the 'treated effluent tunnel/pipeline corridor' for Option 2B. The 'treated effluent tunnel/pipeline corridor' and 'waste water transfer tunnel corridor' for both Options 2A and 2B could directly impact on a Protected Village Amenity Area at Milton. As all pipeline/tunnel corridors would be underground, through either 'cut and fill' or 'directional drilling', it is considered unlikely that they will materially affect these uses long-term, although a temporary impact may occur.
- **Public Right of Way** - A public right of way (PRoW) in the form of a 'byway - open to all traffic' crosses the site north to south (Mere Way). It constitutes a former Roman road. It would be directly affected physically and in amenity terms by the access route and by proximity to site area 2 and by the 'treated effluent tunnel/pipeline corridor', 'waste water transfer tunnel corridor', and 'diversions for existing waste water transfer network' for Options 2A and 2B. As all pipeline/tunnel corridors would be underground, through either 'cut and fill' or 'directional drilling', it is considered unlikely that they will materially affect this use long-term, although a temporary impact may occur.
- **Heritage** - There are areas of Scheduled Ancient Monument to the north-east of Landbeach and the north-east of Milton which could potentially be impacted directly by the 'Waterbeach transfer pipeline corridor' for Options 2A and 2B, and the 'treated effluent tunnel/pipeline corridor' for Option 2B. These sites and the surrounding area may contain important archaeological remains. As all pipeline/tunnel corridors would be underground, through either 'cut and cover' or 'directional drilling', a direct impact

may occur but is unlikely to be permanent or significant. Site area 2 lies west of Mere Way which is formed from an old Roman Road which is an undesignated heritage asset which must be considered in any heritage assessment. The proposed development avoids the need for diversion of this byway, but there will be loss of amenity to users of the byway from the proximity of the new WWTP and possible need for crossing of the route for vehicle access. Potential for archaeological remains is high but may be capable of avoidance or mitigation.

III. Function and value of site in land use terms (including Green Belt)

5.8. Site area 2 comprises agricultural land and is classified as grade 2 or 3 best and most versatile agricultural land⁵. The site is located in the Green Belt in a relatively narrow (c.2km) gap of open countryside separating Milton and Landbeach. There are no other relevant site-specific planning policy designations other than the site is partially within a Waste Consultation Zone due to its proximity to the Milton Landfill site. Existing development within reasonably close proximity to the site includes the Milton Landfill site immediately to the East, a commercial business park to the north and the Milton Park and Ride site east of the Milton Landfill site. There is also a proposal for a new police station south of the existing Park and Ride site.

5.9. The Green Belt Study prepared by Mott MacDonald dated August 2020 considers the overall site performance against Green Belt purpose. For site area 2 it states that:

“The presence of the transport and other large-infrastructure and business units north of the A14 has extended built development into the farmed landscape adjacent to Site 2. This development has encroached on the countryside. The landscape around Site 2 still provides a clear separation between Milton, Histon and Impington and a setting for the historic parts of the villages. It does not contribute to the historic setting of Cambridge owing to severance caused by the A14 and the urban character of the approaches to the city from the north. Site 2 is not currently derelict or urban land.”

5.10. It goes on to conclude that this site has a ‘Fair’ performance as regards Green Belt purposes.

⁵ NPS paragraph 4.8.8 states that Applicants should seek to minimise impacts on the best and most versatile agricultural land, and preferably use land in areas of poorer quality.

IV. Potential impacts of CWWTPR development on

- Green Belt purposes
- Other policy designations
- Surrounding land uses (existing, committed and proposed)

5.11. The Green Belt Study prepared by Mott MacDonald dated August 2020 considers the overall scale of impact. For site area 2 it states that:

“Development on Site 2, in a landscape of existing low sensitivity, would extend the existing developed area south of Butt Lane towards the A14. It would reduce the landscape gap between Milton and Impington. It would further reduce the openness of the Green Belt, though there is existing built development nearby. The development would have little effect on the landscape setting of Cambridge. The taller elements of the development would be visible from Impington and residential properties close to the site, above intervening vegetation. The development would be visible from the PRow along Mere Way”.

5.12. If this site is developed, it is considered that the Green Belt would be harmed by the erosion of separation between the settlements of Histon/ Impington and Milton, particularly in the context of other existing and proposed development in the immediate area. There would also be a loss of openness.

5.13. In planning policy terms, development of this site for CWWTPR will represent inappropriate development within the Green Belt. Actual harm to Green Belt may partially be tempered by the present somewhat compromised performance of this area in Green Belt purpose terms. However, development of the site is likely to significantly diminish the separation between Landbeach and Milton and prejudice the ability of what is an already narrow gap of land to continue to effectively perform its Green Belt purposes.

5.14. The development will be highly visible in views from properties to the west and will require significant landscape mitigation. Proximity of more sensitive land uses particularly to the north west and south west, even with the separation distance allowed in the site selection process, is likely to give rise to amenity concerns, could result in complaints and could impact negatively on businesses immediately to the north. Traffic generated by the development should be contained on Butt Lane and the A10 but will need to utilize the congested A10/A14 junction and may be subject to (at very least) temporary disruption if the network

infrastructure projects referenced above are progressed. In the event that development of any of the sites in the immediate vicinity of site area 2 promoted in the recent call for sites is realised, that development is likely to have a more direct impact the long-term resilience of CWWTPR. Site area 2 sits close to a potential future transport corridor and is the subject of proposals for an extension to the Cambridge Science Park currently being promoted through the emerging Greater Cambridge Local Plan process. This proposal directly affects a significant portion of site area 2. At this time, this proposal has no planning weight. However, it is considered to be a credible promotion by a strategic landowner (Trinity College Cambridge) compatible with growth aspirations for Greater Cambridge for technology related development and the Government's growth prospectus for the OxCam Arc "key economic priority" area. Overlaying site area 2 with this promotion land and accounting for the asset encroachment/safeguarding area, development of a new WWTP here could therefore impede the future strategic growth of Cambridge by prejudicing or at worse obstructing alternative economic development proposals which are likely to be brought forward in the near- to medium future. The risk of encroachment of other development proposals on the area in the future may potentially give rise to operational conflicts such as odour or traffic.

- 5.15. The relatively constrained characteristics and position of site area 2 between Milton and Impington, given surrounding development and the promotion of additional infrastructure and development in the vicinity, restricts the opportunities for this site area to deliver new habitat and improved connectivity.
- 5.16. The corridor for the wastewater transfer tunnel in both Options 2A and 2B crosses a protected village amenity area at the southern end of Milton village. Policy NH/11 states that development will not be permitted within or adjacent to these areas if it would have an adverse impact on the character, amenity, tranquillity or function of the village. However as the wastewater transfer tunnel would be underground and directionally drilled, it is considered unlikely that it would materially affect this designation.
- 5.17. The transfer corridors are also affected by the waste safeguarding areas required in Policy SSPW8. It is considered that the transfer corridors would not adversely affect the existing waste facilities and therefore this designation should not weigh against site area 2.
- 5.18. The discharge pipeline routes run close to or beneath the River Cam Wildlife site and the Milton Road Hedgerow Wildlife site. However, any effects are likely to be temporary due to the depth of the pipeline routes.

- 5.19. Although the government has said that net gain requirements will not be made mandatory for NSIPs under the upcoming Environment Bill, biodiversity net gain and the potential for schemes to deliver and contribute to biodiversity net gain is capable of being an 'important and relevant matter' as part of the DCO determination process. It is Anglian Water's intention (as referenced in the Statement of Requirements and Operational Assessment – Appendix D.1) to deliver biodiversity net gain on this site in relation to additional habitat creation.
- 5.20. The Cambridgeshire Green Infrastructure Strategy 2011 sets out strategic aims and objectives for Cambridge and the wider area. Appendix 7 identifies opportunities for Green Infrastructure Gateways where people can move from urban to rural areas via public routes. Milton Country Park is identified as a Green Infrastructure Destination. Figure 7.12 identifies the Combined Gateway opportunities which includes the whole area north of Cambridge. There is the opportunity to improve the green infrastructure around Mere Way.
- 5.21. The Wildlife Trust is also promoting Nature Recovery Network areas across the county. It may be possible to improve the River Cam corridor as part of this scheme.
- 5.22. There may also be opportunities to link in with the Waterbeach to Cambridge Public Transport Greenway along the river corridor.
- 5.23. In terms of impact on conservation areas, the transfer corridors (as well as being underground) are sufficiently distant to not directly affect them. Their potential impact is not considered to weigh against Site 2 in heritage terms.
- 5.24. There would be no adverse effect on the adjoining landfill site or other land uses in the vicinity, such as the park and ride site.

6. Site Area 3 and Option 3A

I. Policy designations

6.1. None of the land encompassed by site area 3 is specifically allocated for development. However, site area 3 is situated within the Cambridge Green Belt and SCLP Policy SP/4 states that new development in the Green Belt will only be permitted in accordance with national Green Belt policy. Save in respect of the potential development of a new pumping station and its immediate connecting infrastructure at Waterbeach (beyond the outer boundary of the Cambridge Green Belt), site area 3 and the connection corridor option 3A involve development in the Green Belt. The NPS is clear that the general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them⁶. Such development should not be approved except in very special circumstances. *“Very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”.*

6.2. Other site-specific designations affecting Option 3A are:

- Mineral Safeguarding Areas (Sand and Gravel) - This designation may affect the ‘waste water transfer tunnel corridor’, ‘treated effluent tunnel/pipeline corridor’, and ‘Waterbeach transfer corridor’ for Site 3 Option A.
- Conservation Area - The ‘waste water transfer tunnel corridor’ and ‘treated effluent tunnel/pipeline corridor’ for Option 3A run directly through the Fen Ditton Conservation Area. As all pipeline/tunnel corridors would be underground, through either ‘cut and fill’ or ‘directional drilling’, it is considered unlikely that they will materially affect the setting of this designation long-term, although a temporary impact may occur.

⁶ NPS paragraph 4.8.10

II. Description of surrounding land uses and activities and their sensitivity

Planning History and Other Projects

- 6.3. A review of the South Cambridgeshire District Council and Cambridgeshire County Council publicly available planning records has been undertaken (supplemented by a search of local social media channels) to identify any extant planning permissions, current applications or other development projects currently being promoted which, directly or indirectly, could affect or be affected by the development of site area 3 and tunnel and pipeline corridor options.
- 6.4. The 'Waterbeach transfer corridor' for site area 3 could directly affect or be affected by the development of Waterbeach new town, a development comprising a combined 11,000 new homes to the north of Waterbeach. However, this risk is capable of being avoided by careful localised routing in consultation with the developers of Waterbeach new town.
- 6.5. Other known planning applications or projects are:
- 'Marleigh' and Cambridge Airport – At least one part of the 'site access area' for Option 3A has the potential to directly impact land currently committed for development north of Cambridge Airport. The 'Marleigh' (formerly 'Wing') development north of Newmarket Road and east of Fen Ditton has commenced and when complete will provide a new neighbourhood of 1,300 homes with associated open space. The area of the development immediately adjacent to High Ditch Road is identified for open space, sports facilities and allotments.
 - Waterbeach Greenway – If forthcoming, this proposal could affect the 'waste water transfer tunnel corridor' for Option 3A. These proposals currently have no weight in planning terms and are not determinative in this assessment.
 - Cambridge Rowing Lakes - If forthcoming, this project could affect the 'waste water transfer tunnel corridor' for Option 3A. These proposals currently have no weight in planning terms and are not determinative in this assessment.

- As part of the Greater Cambridge Local Plan Call for Sites, two potential development sites have been promoted in the vicinity of site area 3; a large residential site immediately to the south of site area 3 and the A14 either side of the Horningsea Road, and a residential site west of Ditton Lane. The smaller site may affect the wastewater transfer tunnel corridor.

6.6. The location of the site area relative to surrounding land uses and these most relevant proposals are shown on the attached plan “Site Area 3: Contextual Plan”. The plan only identifies the potential site area for the WWTP. Pipeline and tunnel route corridors are identified elsewhere in this report on Mott MacDonald drawings.

Other Land Uses and Activities

6.7. This section considers uses and activities surrounding the site. Land uses and activities include:

- Residential - The village of Horningsea is located approximately 800m to the north from the edge of the indicative development area; the village of Lode is located 3.2km to the north-east; the village of Stow cum Quy is located approximately 1.2km to the east, and the village of Fen Ditton is located approximately 800m to the south-west. There is also a small farmstead located approximately 800m to the north-east. There are 9 properties within 1km of the centre point of site area 3. The settlements would not be directly affected by the relocation; however, they could be affected by the ‘treated effluent tunnel/pipeline corridor’, ‘waste water transfer tunnel corridor’, and ‘Waterbeach water transfer tunnel corridor’ for Option 3A. There is potential for moderate harm to the residential amenity of occupiers, both temporarily during construction and during operation.
- Open Space and Green Infrastructure – Site area 3 lies within an area of open countryside and is surrounded by a network of public rights of way which together have value as a form of green infrastructure. There are no accessible open spaces immediately in the vicinity of site area 3, but an area of public open space for recreation use is currently being developed as part of the Marleigh scheme south of High Ditch Road which could experience a temporary reduction in amenity due to construction activity.

- **Public Right of Way** - A public right of way (PRoW) in the form of a 'byway - open to all traffic' (Fen Drove Way) borders the north eastern boundary of the site. It would be directly affected by development of site area 3 and the 'waste water transfer tunnel corridor' and 'site access area' for Option 3A. There are also footpaths and bridleways which would be affected by the 'treated effluent tunnel/pipeline corridor', 'waste water transfer tunnel corridor', and 'Waterbeach water transfer tunnel corridor' for Option 3A. As all pipeline/tunnel corridors would be underground, through either 'cut and fill' or 'directional drilling', it is considered unlikely that they will materially affect this use long-term, although a temporary impact may occur.
- **Heritage** - Biggin Abbey is a grade II* listed building within the 'treated effluent tunnel/pipeline corridor' for Option 3A. Biggin Abbey and the surrounding area may contain important archaeological remains but may be capable of avoidance or mitigation. Anglesey Abbey is located approximately 2.5km to the east. It would not be directly affected by the relocation or the tunnel and pipeline corridor options. The setting of Biggin Abbey and other heritage assets could be impacted, however as all pipeline/tunnel corridors would be underground, through either 'cut and fill' or 'directional drilling', it is considered unlikely that there would be a long-term impact on the setting of the buildings themselves, however there may be a direct impact on archaeological remains.
- **Biodiversity** - Stow cum Quy Fen is located approximately 1.6km to the north-east. It would not be directly affected by the relocation or the tunnel and pipeline corridor options. The National Trust published the Wicken Fen Vision in 1999 which is a 100-year project to create a diverse landscape for wildlife and people and to increase the area covered by Wicken Fen to 53 square kilometres. This is over an area to the south west of Wicken Fen towards Cambridge. Site area 3 is located in a part of the vision area that could function as a 'gateway', connecting the urban area to the countryside. Poorly designed development of the CWWTPR might compromise the achievement of the Wicken Fen Vision and the environmental and social benefits aspirations of the vision.

III. Function and value of site in land use terms (including Green Belt)

6.8. Site area 3 comprises agricultural land to the east of the A14 and is classified as Grade 2 best and most versatile agricultural land⁷. The site is located in the Green Belt. The site is quite isolated from other development with no other developments or land uses in close proximity.

6.9. The Green Belt Study prepared by Mott MacDonald dated August 2020 considers the overall site performance against Green Belt purpose. For site area 3 it states that:

“The area around site area 3 is open farmland with no large-scale development. Cambridge has a clearly defined edge in this area, with development up to, but not beyond, its boundary. The landscape provides a rural setting for north-eastern Cambridge and the villages of Horningsea, Stow cum Quy, Fen Ditton and Lode and a clear landscape separation between them. Stourbridge Common, Ditton Meadows and the River Cam corridor are a green link between the centre of the city and the countryside, a key feature of the city’s historic character. The landscape around site area 3 provides an important recreational resource for Cambridge. The A14 and an overhead power line, which crosses the site, detracts from the rural character of the landscape.”

6.10. It goes on to conclude that this site has a ‘Good’ performance against the purposes of the Green Belt.

6.11. The effluent pipeline corridor encompasses a grade II* listed building known as Biggin Abbey. This site and surrounding area may contain important archaeological remains. The wastewater transfer tunnel corridor also passes through the Fen Ditton conservation area.

IV. Potential impacts of CWWTPR development on

- Green Belt purposes
- Other policy designations
- Surrounding land uses (existing, committed and proposed)

⁷ NPS paragraph 4.8.8 states that applicants should seek to minimise impacts on the best and most versatile agricultural land, and preferably use land in areas of poorer quality

- 6.12. The Green Belt Study prepared by Mott MacDonald dated August 2020 considers the overall scale of impact. For site area 3 it states that:

“Development on site area 3, in a landscape of existing medium sensitivity, would introduce large-scale development into a rural area, contributing to the extension of sprawl of large built-up areas, encroaching on the countryside and reducing the openness of the Green Belt, due to the absence of existing built development nearby. The compactness of the city in this location would be reduced and the landscape gap between Horningsea and Stow cum Quy would be narrowed. The scheme would be clearly visible in the open landscape from the A14 and nearby PRow and its taller elements would be apparent from Stow cum Quy, Lode, Horningsea and Fen Ditton, detracting from the rural setting of the villages.”

- 6.13. In planning policy terms, development of this site for CWWTPR will represent inappropriate development within the Green Belt. Site area 3 is close to protected landscapes and habitats and in an area with a higher recreational value than surrounds site areas 1 and 2. Site area 3 provides a good contribution to Green Belt purposes due to the openness of the area and lack of other development. The development of a new WWTP within site area 3 will impact on this contribution. Development on site area 3 would introduce large-scale development into a rural area, contributing to the extension of the urban edge of Cambridge into the countryside. It would reduce the openness of the Green Belt in this location due to the absence of existing built development nearby.

- 6.14. The exposed nature of the site will result in development being highly visible in views from surrounding properties and viewpoints and will require significant landscape mitigation. The relative isolation of the site and absence of sensitive land uses in closer proximity is likely to limit the risk of amenity concerns and complaints. Traffic generated by the development would avoid the congested A10/A14 junction and potential disruption from network infrastructure projects but access to the site would require more extensive works including to the existing local road network which may cause (at very least) temporary disruption and amenity impacts.

- 6.15. As the boundary of site area 3 is beyond 400m from the nearest part of the Marleigh development on the opposite side of the A14, it is considered unlikely that the CWWTPR development will give rise to greater

than a negligible odour impact on sensitive receptors in the Marleigh development or give rise to particular amenity concerns to new residents. No part of site area 3 is the subject of any development promotion which could directly impact on the delivery and long-term resilience of CWWTPR. Whilst at this time any such proposal has no planning weight, development of the land between the south side of the A14 and High Ditch Road as promoted in the recent call for sites to the emerging Greater Cambridge Local Plan process would result in encroachment within 400m of the boundary of site area 3. However, based on the site 3 indicative development area, the opportunity for micro-siting of particular infrastructure within this area and the inevitable need on the promotion land for some separation between any new housing and the A14 carriageway, it is considered reasonable to presume that development of CWWTPR at site 3 and housing on the promotion land south of the A14 would not be mutually exclusive and should be able to avoid the encroachment/safeguarding area. This indicates greater potential long-term resilience of CWWTPR on this site.

- 6.16. Development of site area 3 will need significant mitigation in terms of landscape, biodiversity and heritage. Development of CWWTPR on the site could compromise the achievement of the Wicken Fen Vision. However, based on ongoing dialogue with the National Trust and other environmental bodies aimed at ensuring that development aligns with the aspirations for the wider area, the relatively unconstrained characteristics and position of site area 3 between the 'Eastern Gateway' urban expansion area of Cambridge and the Wicken Vision area present opportunities to deliver significant enhancements to the environment and to the connectivity of this area consistent with a number of the aspirations of the Wicken Fen Vision, the Cambridgeshire Green Infrastructure Strategy 2011 and the adopted South Cambridgeshire Local Plan 2018.
- 6.17. Although the government has said that net gain requirements will not be made mandatory for NSIPs under the upcoming Environment Bill, biodiversity net gain and the potential for schemes to deliver and contribute to biodiversity net gain is capable of being an 'important and relevant matter' as part of the DCO determination process. It is Anglian Water's intention (as referenced in the Statement of Requirements and Operational Assessment – Appendix D.1) to deliver biodiversity net gain on this site in relation to additional habitat creation in support of the Wicken Fen Vision (considered in the Environmental Assessment at Appendix B).

- 6.18. The Cambridgeshire Green Infrastructure Strategy 2011 sets out strategic aims and objectives for Cambridge and the wider area. Appendix 7 identifies opportunities for Green Infrastructure Gateways where people can move from urban to rural areas via public routes. Wicken Fen is one of a number of areas identified as a Green Infrastructure Destination. Figure 7.12 identifies the Combined Gateway opportunities which includes the whole area north of Cambridge.
- 6.19. The Wildlife Trust is also promoting Nature Recovery Network areas across the county. It may be possible to improve the River Cam corridor as part of this scheme.
- 6.20. The wastewater transfer tunnel corridor is quite wide and passes through the Fen Ditton conservation area and the effluent pipeline corridor encompasses a grade II* listed building known as Biggin Abbey. Whilst these elements of the project are below ground it is possible there may be some adverse impact on heritage and archaeological remains.

7. Scope to Mitigate Land Use Impacts

- 7.1. Land use impacts can, at least in some respects, be mitigated through (for example) avoidance (e.g. diverting transfer corridors and access routes), the provision of replacement or additional land and facilities, relocation of amenities, translocation of habitat, visual screening, noise attenuation, etc. In these situations, planning policies make allowance for measures to avoid, reduce or compensate for any adverse impacts (e.g. policies using such phrases as 'development should minimise...'). A number of these potential mitigation measures are identified in the other assessments undertaken in this report. Potential measures to mitigate land use impacts for each site option are identified further below.
- 7.2. Some impacts, however, cannot be mitigated. Statutory provisions and certain planning policies are inflexible and seek to prevent certain development impacts. Loss of or substantial harm to designated heritage assets and inappropriate development in Green Belt are examples. In such circumstances, development proposals and their impacts can only be judged on whether they are compliant with these statutory provisions and policies or not. Non-compliance must be acknowledged as an adverse impact of proposed development and assessed as part of an overall judgement of the potential benefits and potential adverse impacts of proposed development (NPS para. 3.1.3). This is referred to as the 'planning balance'.

The degree of adverse impact (or harm) and the degree of potential benefits will differ between considerations. So, for example, loss of designated heritage assets and harm to Green Belt are matters on which planning policy advocates ‘great’ and ‘substantial’ weight respectively to be given⁸, whereas planning policy places less weight on harm arising from landscape impact outside nationally designated areas. Where the benefits of proposed development demonstrably outweigh the adverse impacts, a conclusion that exceptional and/or very special circumstances apply may be reached.

7.3. All three site areas and related connection corridor options are situated within the Cambridge Green Belt (as defined in the South Cambridgeshire Local Plan 2018). At least one element of the project, namely the WWTP itself, does not fall within the exceptions set out at paragraphs 145 and 146 of the NPPF and must, accordingly, be considered to be inappropriate development which is *“by definition, harmful to the Green Belt and should not be approved except in very special circumstances”*⁹. The proposed pumping station at Waterbeach is outside the Green Belt boundary, as are sections of the rising main connection and transfer tunnels in the vicinity of Waterbeach and to the south of the A14. A number of the elements of the project also fall within the exceptions to inappropriate development listed at paragraphs 145 and 146 of the NPPF. The transfer tunnels, proposed access roads to the WWTP and discharge point potentially fall within the exceptions at NPPF paragraphs 146(b) (engineering operations) and 146(c) (local transport infrastructure which can demonstrate a requirement for a Green Belt location) and may not, therefore, be considered to constitute ‘inappropriate development’.

7.4. In order to satisfy the requirements of the NPS, therefore, ‘very special circumstances’ will need to be demonstrated before development of any one of the three WWTP site options can be consented. Very special circumstances *“will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”*¹⁰. Whether these ‘other considerations’ are sufficient to constitute very special circumstances in this instance is a matter for the determination of the Secretary of State. Except in respect of particular site-specific matters which may differentiate the three shortlisted sites,

⁸ See e.g. NPS paragraphs 4.10.14 and 4.8.18 respectively

⁹ Consistent with NPS paragraph 4.8.10

¹⁰ NPS paragraph 4.8.14

the principal ‘other considerations’ which may contribute to a conclusion of very special circumstances will apply equally to each site and are likely to cover:

- a clear and compelling need for the proposed development;
- absence of suitable alternative sites for the development outside the Cambridge Green Belt; and
- consistency of the project with the Government’s key policy objectives¹¹.

7.5. Based on the above comments, the scope for mitigation of Land Use Impacts under each site option are considered below.

7.6. The focused assessments undertaken under the Operational, Programme, Economic, Environment and Community assessment criteria covered elsewhere in this report identify various opportunities to mitigate potential impacts on water quality and resources, odour, biodiversity and geological conservation, landscape and visual, historic environment and traffic and transport.

Site 1 – Options 1A and 1B:

The scope to mitigate socio-economic impacts on the fruit farm business, including by re-routing the ‘treated effluent tunnel/pipeline corridor’ and ‘waste water transfer tunnel corridor’ for Option 1A, and the ‘waste water transfer tunnel corridor’ for Option 1B is considered limited. Impacts on residences in Milton and Landbeach could be mitigated by sensitive routing away from these existing areas of the ‘treated effluent tunnel/pipeline corridor’, ‘waste water transfer tunnel corridor’, and ‘diversions for existing waste water transfer network’ for Option 1A, and the ‘waste water transfer tunnel corridor’ and ‘diversions for existing waste water transfer network’ for Option 1B. Similarly, impact from the ‘site access area’ for Options 1A and 1B could be at least partially mitigated by sensitive positioning. Impacts on Open Space and Green Infrastructure and the adjacent PRoW could only partially be mitigated by visual screening. Sensitive routing of the ‘treated effluent tunnel/pipeline corridor’ and ‘waste water transfer tunnel corridor’ for both Options 1A and 1B away from the Protected Village Amenity Area at Milton could reduce or avoid impact. Similarly, the risk of heritage impacts could be mitigated by sensitive routing of the ‘Waterbeach transfer pipeline corridor’ for Options 1A and 1B, and the ‘treated effluent tunnel/pipeline corridor’ for Option 1B.

¹¹ Including (but not limited to) those set out at NPS paragraph 2.2.3

Site 2 – Options 2A and 2B:

Potential impacts on the business park located to the immediate north, and disruption to the businesses to the north of Butt Lane could be mitigated by sensitive routing of the 'treated effluent tunnel/pipeline corridor', 'waste water transfer tunnel corridor', and 'diversions for existing waste water transfer network' for Option 2A and 2B. Impacts on residences in Milton and Landbeach could be mitigated by sensitive routing away from these existing areas of the 'treated effluent tunnel/pipeline corridor', 'waste water transfer tunnel corridor', and 'diversions for existing waste water transfer network' for Option 2A, and the 'waste water transfer tunnel corridor' and 'diversions for existing waste water transfer network' for Option 2B. Impacts on Open Space and Green Infrastructure and the adjacent PRow could only partially be mitigated by visual screening. Sensitive routing of the 'treated effluent tunnel/pipeline corridor' and 'waste water transfer tunnel corridor' for both Options 2A and 2B away from the Protected Village Amenity Area at Milton could reduce or avoid impact. Similarly the risk of heritage impacts could be mitigated by sensitive routing of the 'Waterbeach transfer pipeline corridor' for Options 2A and 2B, and the 'treated effluent tunnel/pipeline corridor' for Option 2B.

Site 3 – Option 3A:

Impacts on Open Space and Green Infrastructure and the adjacent PRow could be mitigated by visual screening. Opportunity to deliver significant enhancements to the environment and to connectivity between the city and the countryside (including Stourbridge Common, Ditton Meadows and the River Cam corridor green links) consistent with a number of the aspirations of the Wicken Fen Vision, the Cambridgeshire Green Infrastructure Strategy 2011 and the adopted South Cambridgeshire Local Plan 2018. The risk of heritage impacts on Biggin Abbey could be mitigated by sensitive routing of the 'treated effluent tunnel/pipeline corridor' for Option 3A. Potential impacts on the setting of Biggin Abbey and other heritage assets could be mitigated by appropriate landscape screening.

- 7.7. It is not the purpose of this assessment, nor is it appropriate at this stage of the project, to further rehearse the justification for development within the Green Belt. What is relevant to this final stage of the Site Selection process is whether each site option is consentable (having regard to the relevant guidance in the NPS). This is considered below.

8. Overall NPS Planning Policy Assessment of Site Options (Mitigated)

- 8.1. Based on the above Land Use Impact assessment and the findings from the Operational, Programme, Economic, Environment and Community assessment criteria, an overall assessment of how each mitigated option performs against planning policy and the extent to which each option is capable of being granted consent in the context of the requirements of national policy gives the following results:

Planning Assessment

CWWTPR - Stage 4 Final Site Selection



NPS Planning Policy Assessment

ID	Criteria referenced in the NPS	Summary of Findings
1	Water quality and resources (Groundwater)	For site area 1 mitigation would include the following: • Production of a CoCP and use of SuDS in order to reduce risks of contamination or pollution during construction works. • Adjusting pipeline and tunnel routes in order to avoid potential contamination sources. • Use of a primary and secondary lining for tunnel sections and shafts passing through the Lower Greensand or Grey Chalk aquifers • Pipeline crossings of roads and railways would be constructed by pipe-jacking, micro-tunnelling or directional drilling to avoid surface disruption. • Risks to surface waters could be mitigated through SuDS design, flood storage compensation, engineering features and WWTP operational practices. • Test pumping during ground investigations will be required in order to assess potential impacts on the Lower Greensand aquifer during construction (dewatering) and mitigation measures to minimise impacts on users, water courses and wildlife sites as a result of dewatering in the Lower Greensand. • For option 1A, there is potential for mobilisation of contaminants (if present) along the treated effluent corridor (if in pipeline), through the River Terrace Deposits, towards the River Cam. If contamination is encountered, remediation may be required. For site area 2 mitigations would be similar to those for site area 1 but also include the following: • Risks from ground gases at the WWTP can be mitigated through ground investigation. Ground gas monitoring should be undertaken to establish the gas regime at the site and to allow gas protection measures to be designed and installed in new buildings, if required. • If contamination is encountered on site, a Foundation Works Risk Assessment would be required to ensure any potential risks from piling through the River Terrace Deposits are mitigated. For site area 3 mitigation would be similar to those for site area 1 but also include the following: • The River Cam crossing for the pipeline from Waterbeach to Site 3 would be constructed beneath the river by micro-tunnelling or directional drilling. Construction activities at the location would be undertaken either side of the river and away from the river banks to ensure that the construction of the crossing does not disturb the river.
	Water quality and resources	Mitigation measures are available for all site area options.

Planning Assessment

CWWTPR - Stage 4 Final Site Selection



	(Surface Water)	
2	Odour	The same mitigation measures are proposed for site areas 1, 2 and 3. The mitigation measures include: • Installing covers on additional process units; and/or • Orientation and design of the WWTP such that process units would be further away from receptors.
3	Flood risk and drainage vulnerability	N/A
4	Biodiversity and geological conservation	Similar mitigation measures are proposed for site areas 1 and 2. The mitigation measures include: • Larger area for Biodiversity Net Gain to address potential for protected species and potential temporary impact on County Wildlife Site (Cottenham Moat); • Temporary measures to avoid impacts on lower greensand; • Temporary measures to avoid potential risk of encountering/mobilising contamination in proximity to landfill site. For site area 3, mitigation opportunities include: • Measures to reduce impact on County Wildlife Site • Opportunity for enhancement in relation to Quy Fen and integration with Wicken Fen vision
5	Coastal change	None of the site options is within an area subject to risk from coastal change.
6	Landscape and visual impacts	Similar mitigation measures are proposed for site areas 1, 2 and 3. The mitigation measures include: • Concentrating tree planting to screen views from the areas most exposed to visual receptors; • Planting along field boundaries to follow existing field patterns to help planting proposals blend-in with the existing landscape character; • Incorporating bunding, where appropriate, to minimise impact on receptors; • Carefully designing the site layout to take into consideration the location of PRoWs, with planting and screening located where the site is adjacent to PRoWs to minimise the impact on views from the PRoW; • Retention and inclusion of additional hedgerows (planting and enhancement) to screen potential access roads and enhance existing field boundaries to grade the visual impact; • Proposals for tree planting of minimum 20m depth in order to provide effective visual screening in winter; and • Where possible, following agreement with landowners, off-site planting to strengthen mitigation.
7	Land use	Scope for mitigation is addressed in the text above.
8	Noise and vibration	The same mitigation measures are proposed for site areas 1, 2 and 3. The mitigation measures include: • The use of Best Practicable Means (BPM) in accordance with BS5228-1&2:2009+A1:2014 guidance.

Planning Assessment

CWWTPR - Stage 4 Final Site Selection



		In addition to the above, appropriate mitigation design would be considered to minimise any potential adverse noise impacts at the nearest noise sensitive receptors (including plant and equipment selection, location within the site, and screening and attenuation measures (e.g. acoustic enclosures, barriers or bunds).
9	Historic environment	The same mitigation measures are proposed for both site areas 1 and 2. The mitigation measures include: - Design considerations should aim to minimise change within the setting of designated heritage assets. - Archaeological investigation would be required if site area 1 is selected. Geophysical survey, trial trenching and/or other survey may identify areas of greater archaeological potential or specific remains of moderate value within the site area. Mitigation measures for sites 1 and 2 related to design considerations and archaeological investigations also apply to site area 3. However, additional measures include: - Additional design considerations to reduce the potential for impact on Biggin Abbey (grade II* listed) - Protection of the listed milestone - Fleam Dyke – avoid widening the access road unless absolutely necessary or if the road must be widened this should aim to avoid Fleam Dyke rather than focus on widening on only one side of the road.
10	Air quality and emissions	The same mitigation measures are proposed for site areas 1, 2 and 3. The mitigation measures include: - Dust control measures consistent with best practice environmental management will be implemented. - Construction and operational traffic may require further assessment as the vehicle movements exceed the assessment thresholds within the Environmental Protection UK and Institute of Air Quality Management guidance 'Land-Use Planning and Development Control: Planning for Air Quality' (2017). - Dispersion modelling would be used to quantitatively assess the likely impacts from construction and operation along likely site access and haulage routes; if significant effects are found to be likely, appropriate mitigation will be recommended as necessary.
11	Dust, artificial light, smoke, steam and insect infestation	Dust impacts during construction and impacts from artificial light are capable of mitigation as considered as part of the air quality, landscape and visual impact assessment and biodiversity assessments. Impacts from smoke, steam and insect infestation are considered to be low and equal to each site.
12	Traffic and transport impacts	The same mitigation measures are proposed for both site areas 1 and 2. The mitigation measures are that the design of site access from Butt Lane will take into consideration the following: - The A10 will be used as the main route to the A14 - Adverse impacts on A10 traffic must be minimised - That the access road route should minimise impacts on local farmers, land take and impacts on users of Mere Way.

Planning Assessment

CWWTPR - Stage 4 Final Site Selection



		For site area 3, mitigation opportunities include changing the proposed access route to include access from Junction 35 of the A14 via High Ditch Road/Low Fen Drove Way rather than from Junction 34 via Horningsea Road. The proposed mitigation would require highways Improvements to High Ditch Road and associated junctions as well as signalling measures and signage improvements.
13	Waste management	Arrangements proposed for managing any waste produced (including waste recovery and disposal of all waste generated by the development) are likely to be the same for each site option.
14	Socio-economic	Impacts are likely to be similar in terms of job creation and training opportunities for each option, as are demand for services and facilities. Development of any of the site areas will impact on existing farm businesses, with potentially the most significant impact being to the fruit farm business at site area 1. Impact on surrounding socio-economic activity caused by temporary disruption to businesses is likely to be greater at site areas 1 and 2 given the potential for impacts on businesses located on Butt Lane. Socio-economic effects arising from impacts on PRowS are unlikely to differ substantially between sites.

9. Planning Assessment and Conclusions

- 9.1. Analysis of the assessments undertaken for each option under the Operational, Programme, Economic, Environment and Community criteria (covered elsewhere in this report), and the impact on land use assessments set out above provides the basis to judge how each option (with mitigation) performs against planning policy and whether each option is capable of being granted consent in the context of the requirements of national policy.
- 9.2. In this instance, and because all of the site options impact on Green Belt, clear distinction between the relative suitability of each site area and transfer corridor option is difficult. All sites raise concerns in planning terms, in particular because they would result in the loss of best and most versatile agricultural land¹², impact on (albeit to different extents) Mineral Safeguarding Areas (Sand and Gravel) and development on each would comprise (at least in respect of the WWTP itself) inappropriate development within the Green Belt. All three sites are, therefore, equally objectionable in these terms.
- 9.3. The Green Belt Study prepared by Mott MacDonald dated August 2020 concludes that site area 3 is in a part of the Green Belt that makes a ‘good’ contribution to the purposes of the Green Belt (as compared to ‘fair’ contributions for site areas 1 and 2) and that its development would have more adverse effects on the openness and purposes of the Green Belt (site area 2 would have the least). All three sites would extend the urban edge of Cambridge into the countryside and reduce the landscape gaps between adjacent settlements, but the impact on openness in the Green Belt is assessed to be greatest at site area 3 “*due to the absence of existing built development nearby*”.
- 9.4. The very fact that the Green Belt in the area around site areas 1 and 2 is compromised by existing development (and the threat of more development in the future) provides the rationale for the conclusion that development on these sites would be less harmful on openness (particularly at site area 2). But it could equally be concluded that, because of the relative openness of site area 3, development within it could better be assimilated with appropriate landscape mitigation whilst maintaining the permanence and efficacy of the Green Belt, in contrast to site areas 1 and 2 where development would bring into question whether the immediately surrounding area could continue to play an effective Green Belt role. Similarly, if

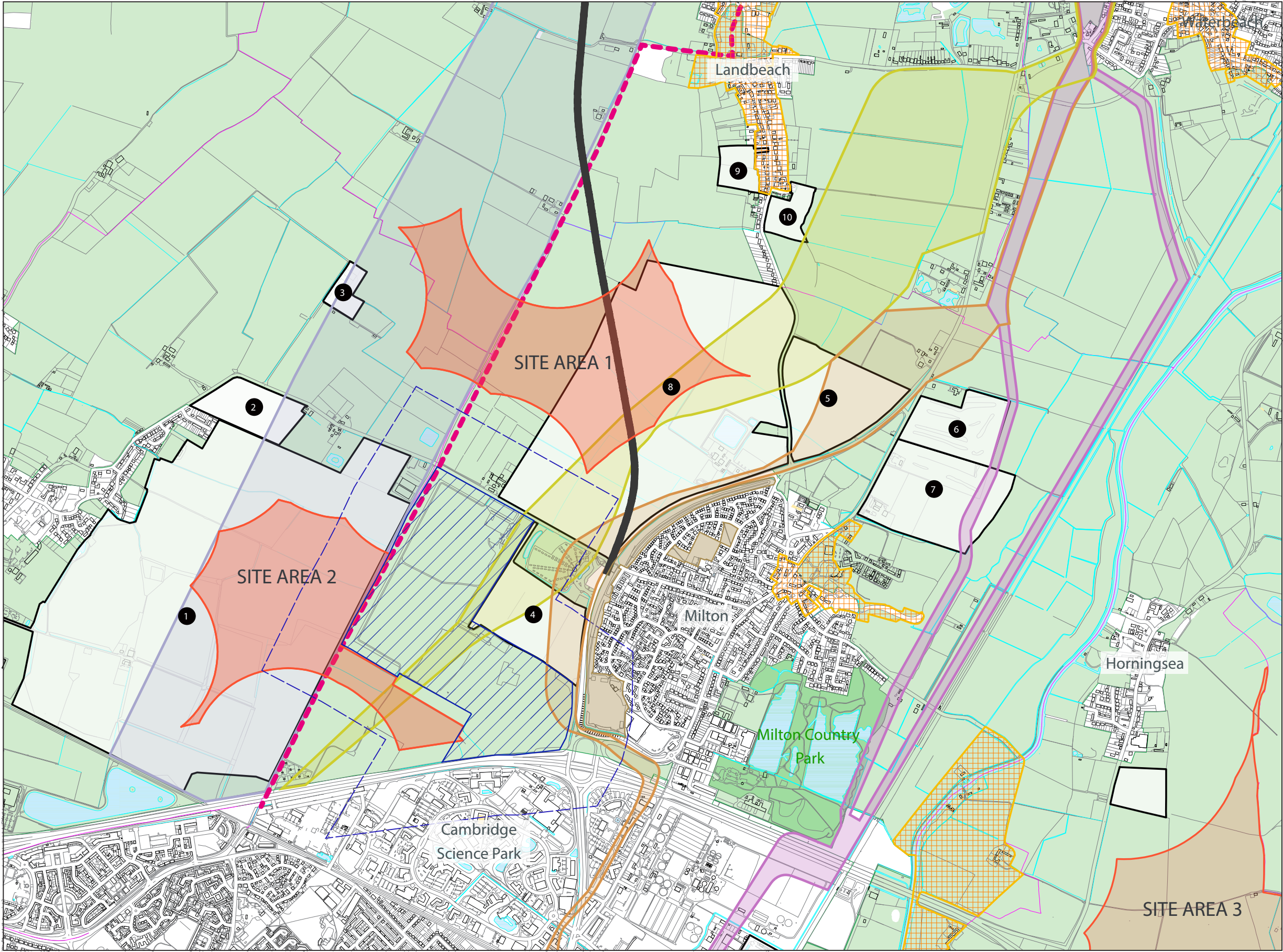
¹² See NPS paragraph 4.8.8

the case for at least some of the future development contemplated in the vicinity of site area 1 and particularly site area 2 is accepted and it comes forward, there would seemingly be very high probability either of this development being frustrated by CWWTPR, or the resilience and future scope for growth of the WWTP beyond its current design life being threatened. The same threat is considerably lower at site area 3, where the resilience of CWWTPR and its scope to accommodate future growth is much less likely to be compromised by surrounding development pressures (thus offering scope for potential longevity similar that achieved at the existing WWTP).

- 9.5. In terms of the other criteria referenced in the NPS aside from land use, the NPS itself recognises¹³ that some adverse impacts from this form of development may be unavoidable. Presuming that the need for CWWTPR and the absence of suitable alternative relocation sites outside Green Belt can be demonstrated sufficient to amount to 'very special circumstances', the scope to mitigate adverse impacts from development on each of the three site areas and their related transfer corridor options are broadly similar, although development of site area 3 for CWWTPR (being in a part of the Wicken Fen vision area) both threatens the achievement of the Wicken Fen Vision and potentially offers greatest opportunity to contribute to the delivery of a 'gateway' connecting the urban area to the countryside (including Stourbridge Common, Ditton Meadows and the River Cam corridor green links) and to support the biodiversity elements of this vision and realisation of the aspirations for the wider area in the Cambridgeshire Green Infrastructure Strategy 2011 and the adopted South Cambridgeshire Local Plan 2018.
- 9.6. Based on the above, and subject to a 'very special circumstances' Green Belt case, it is concluded that all site options are capable of satisfying the requirements of the NPS sufficient to deliver a consentable project.

¹³ See, for example, NPS paragraph 1.4.4

Annexes



KEY:

- Site Area Options
Source: Mott MacDonald
- Milton Country Park
Source: Savills Maps
- Green Belt
Source: Savills' GIS Database
- A10 Option D
Source: Jacobs: BESP0020-JAC-HGN-XX-SK-CH-0007
- Household Waste Recycling Centre and Landfill
Source: scams.gov.uk - 79/16
- Waste Consultation Area
Source: scams.gov.uk - 79/16
- Protected Village Amenity Area (Policy NH/11)
Source: scams.gov.uk - 79
- Conservation Area
Source: scams.gov.uk

Call for Sites:

- Most Relevant
Source: greatercambridgeplanning.org - Site Submission Map
- 1 Non- Residential
- 2 Residential
- 3 Non Residential
- 4 Mixed Use
- 5 Non-Residential
- 6 Residential
- 7 Residential
- 8 Mixed Use
- 9 Residential
- 10 Residential

Waterbeach to Cambridge Better Public Transport Study

- Central Area of Interest
Source: Waterbeach to Cambridge Consultation Brochure
- A10 Area of Interest
Source: Waterbeach to Cambridge Consultation Brochure
- West Area of Interest
Source: Waterbeach to Cambridge Consultation Brochure
- East Area of Interest
Source: Waterbeach to Cambridge Consultation Brochure
- Mere Way Upgrades
Source: Waterbeach to Cambridge Consultation Brochure

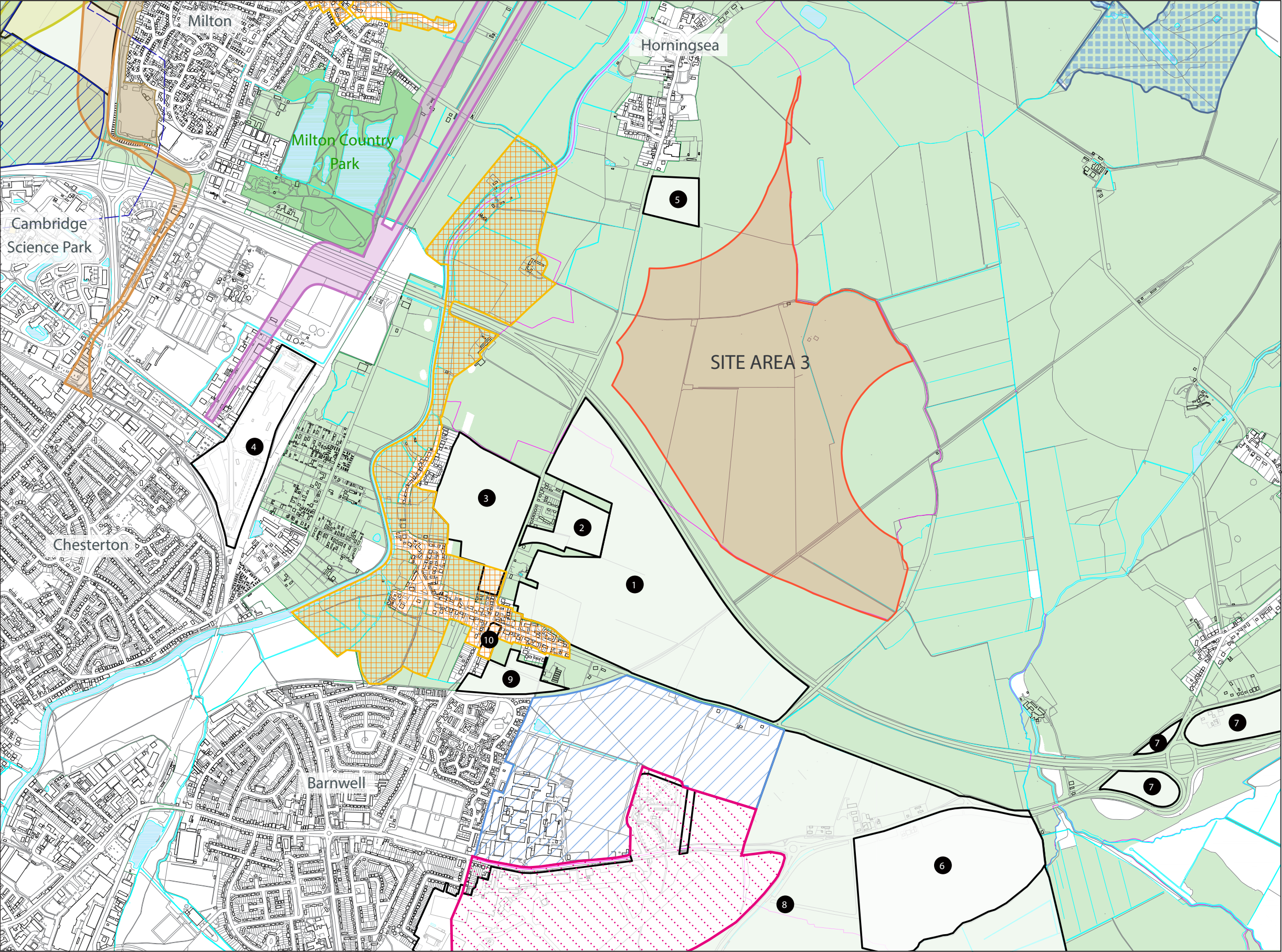
Site Area 1 + 2: Contextual Plan

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drawing no.	01	drawing	Site Area 1+2: Context Plan
revision	A	scale	NTS
drawn by	ML	checked by	AD
date	18/01/21	job no.	CAKC404351

NOTES:
This plan has been prepared for illustrative purposes only and contains elements that have been reproduced from external sources.

Caveats apply, to be used for information purposes only.



KEY:

- Site Area Options
Source: Mott MacDonald
- Milton Country Park
Source: Savills Maps
- Green Belt
Source: Savills' GIS Database
- Conservation Area
Source: scamb.gov.uk
- Site of Special Scientific Interest
Source: Savills Maps
- Safeguarded Land (Policy SS/3 (4))
Source: scamb.gov.uk - Inset C Cambridge East
- Major Development Site (SS/3 (1a))
Source: scamb.gov.uk - Inset C Cambridge East

Call for Sites:

- Most Relevant
Source: greatercambridgeplanning.org - Site Submission Map
- 1 Residential
- 2 Residential
- 3 Residential
- 4 Residential or non- residential
- 5 Residential
- 6 Residential
- 7 Non-residential
- 8 Mixed use
- 9 Residential
- 10 Residential

Site Area 3: Contextual Plan

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drawing no.	02	drawing	Site Area 3: Context Plan
revision	A	scale	NTS
drawn by	ML	checked by	AD
date	18/01/21	job no.	CAKC404351

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F.2 Incorporating feedback

F.2.1 Phase one non-statutory consultation was held in order to share the proposals for relocating the WWTP with the public and stakeholders. This section provides a summary of the feedback received from the public in relation to planning aspects and how the concerns, issues and opportunities raised have been considered within the assessment criteria for Stage 4 final site selection.

Table F.88: Planning feedback

Sub-Theme	Site (if specific)	Feedback Summary	CWWTPR Response
General	All sites	Perhaps the most common 'other' theme is a challenge to the need for relocation, and therefore a request for the plant to remain at the current site.	It is for the Councils to demonstrate that their proposed level of development cannot be achieved on the North East Cambridge site without the relocation of the treatment works. The North East Cambridge AAP relies on the relocation of the works in order to accommodate the proposed redevelopment of the site.
		Respondents also reported concern regarding potential negative impacts to house prices and quality of life in the vicinity of a new plant.	House prices are not a material planning consideration. The site selection process has sought to achieve at least 400m from residential properties and other mitigation will be put in place to further mitigate impacts on residential amenity
		There was also a theme of concern that the relocated plant will increase the potential for future developments to be brought forward and approved.	This project is solely for the proposed relocation of the waste water treatment works. It does not include any other development proposals.
		A respondent requested that the new resources are created as part of the relocation, rather than exploiting existing infrastructure (e.g. roads, housing space, bicycle routes, bus routes).	This project will provide new infrastructure to replace the existing works and also to provide capacity for predicted development growth.
	Site areas 1 and 2	Concerns about the proposed A10 dualling also have implications for the consideration of planning criteria.	Anglian Water is liaising with the Cambridgeshire and Peterborough Combined Authority regarding the A10 upgrade to ensure there are no conflicts with either proposal.
	Site area 1	Comment that Site 1 affects land belonging to Sunclose Farm and could therefore potentially reduce the number of local job opportunities as well as availability of local produce.	The impact on local job opportunities will be assessed in the DCO submission
	Site area 3	Similarly, it was commented that Honey Hill (Site 3) is also high-grade agricultural land of local and national value.	Agricultural land value has been taken into account in the site selection process

Sub-Theme	Site (if specific)	Feedback Summary	CWWTPR Response
Greenbelt	General	This is one of the most frequently raised issues with the relocation, with significant respondents being opposed to development of a greenbelt sites for this purpose. A range of values placed on the existing greenbelt have been submitted (e.g. public wellbeing, prevention of Urban sprawl, existing wildlife, and habitats).	It is recognised that all three sites are located in the Green Belt and that very special circumstances will have to be demonstrated in the final DCO submission
	Site area 3	Comment that Local greenbelt area will become more important to locals as the Marleigh housing development is completed.	The new development at Marleigh has been taken into account in the Stage 4 planning assessment.