Cambridge Waste Water Treatment Plant Relocation Project
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Our ref CWWTPR/FDPC1

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16th March 2023

Dear Charles

RE: Fen Ditton Parish Council Response to CWWTPR Phase 3 Consultation

We would like to thank Fen Ditton Parish Council for taking the time to respond to our Phase Three Consultation and engagement in subsequent meetings on the proposals to relocate the existing Cambridge Waste Water Treatment Plant from Cowley Road and build a new, modern, low carbon waste water treatment plant (WWTP) for Greater Cambridge. Since the close of the final phase of consultation we have been considering all of the responses received and as you will have seen, published our Phase Three Consultation Summary Report. We also wanted to provide an individual response to you on some of the points you have raised during this last phase and for ease of reference have used the numbering in your response.

1.1 Capacity – page 2
Thank you for your comments on capacity and future growth. As we have advised previously, we are confident that we have space on site, within the earthwork bank, to accommodate future growth. We have set out the extent of our proposals and this topic can be interrogated as part of the evidence process, through the planning inspectorate, once we have submitted the Development Consent Order (DCO) application.

1.2 Sludge Treatment Centre – page 2
All of the predicted HGV movements is included in the Environmental Statement Chapter on Traffic and Access that supports the DCO Application. We have used the forecasted maximum allowance of 16,000 tonnes dry solids (tds)/year. We note the comments about concerns from a visual and odour perspective. Mitigation measures are in place for emptying sludge into the treatment plant at the site, and an Odour Management Plan will be in place. We have also considered this in the odour modelling as part of the finalised Environment Statement.

1.3 Stormwater – page 3

We are confident that the storm storage capacity is adequate. The Environment Agency calculate storm storage *capacity at 68 litres per person*. This means that storm capacity is calculated by population equivalent x 68 = 275000 x 60 = c19ML (Megalitres). The proposed WWTP will be treating approximately 65% more baseline flows than the current WWTP capability. This has the biggest impact on the storm resilience as it means more flows are being treated to the permitted discharge consent before having to be sent to the storm tanks for storage.

2.0 Structures – page 4

Following Phase Three Consultation modifications have been made to the design to further reduce the visual impact of the Gateway Building and car park.

3.0 Lighting – page 5

Following Phase Three Consultation the lighting columns have been reduced to 5 metres. The lighting will be directed downwards and generally used for tasks only. There should be no lights visible under normal operation. Lighting outside of the rotunda will be discrete and kept to a minimum for safety reasons. It will also be active for use, not activated through night-time hours. A lighting assessment has been carried out, lighting plans are set out in the Project Description and a Lighting Strategy is submitted as part of the DCO Application.

4.0 Tunnels and pipelines – page 6

Following Phase Three Consultation the design has been modified to relocate shaft 4 to a less intrusive position. The shaft has now moved East by approximately 50m and no longer means hedgerows will be removed or access required to the same field. Due to technical constructability risks, shaft 4 cannot be moved any further east. Shaft 4 is a temporary, construction shaft not a permanent feature. Otherwise, we intend to arrange supply of precast tunnel and shaft segments or rings from offsite manufacture and not from a casting yard inside the redline boundary.

5.0 Land take – page 6/7

We have considered the proposed boundary alignment on the north-east boundary of the works, this has changed slightly since Phase Three Consultation to follow field boundaries more closely. We intend to retain the current path layout (as already explained to FDPC it provides the best option from an environmental and cost perspective).

Please also note:

- The Order Limits east of Horningsea Road and south of the A14 have been reviewed as part of the final DCO application development production and the Scheme Order Limits have been reduced to reflect a reduced land take need and remove unused land.
- The Scheme Order Limits north-east of the proposed new site have been reviewed and reduced to reflect changes to the landscape design, field boundaries and exclusion of several overhead line pylons.
- The justification for the proposed Waterbeach pipeline route alignment is explained in the final DCO Application.
- The Old Barn has been excluded from the final Scheme Order Limits.
- The amount of land that will be taken permanently is shown on the Land Plans in the DCO Application.

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6.0 Traffic – page 8

Traffic mitigation – We are working with the National and Local Highways Authorities to design mitigation that prevents traffic from taking shortcuts. Details are set out in the final highway design plans and CTMP submitted with the DCO Application. HGVs are GPS enabled and monitored, Horningsea Rd does not allow HGVs and the Applicant will be notified if they do go down a prohibited road. There will also be a geofence in the GPS system to prevent vehicles going down these areas. We will provide a postcode for a point of reference for construction traffic. We will engage with the community during construction, further details are set out in full in the Community Liaison Plan submitted with the DCO Application.

Traffic modelling - We undertook traffic surveys in early December 2021 with agreement from Cambridgeshire County Council to collect baseline traffic data at the junctions that would be used for construction and operational traffic. This has been supplemented by surveys in May 2022 to provide a check that the volumes counted in 2021 were suitable for use as a baseline. This has been shared and agreed within our Traffic and Access Stakeholder Technical Working Group, which includes representatives from the National and Local Highways Authorities.

We have looked at future scenarios for 2026 as peak construction year, 2028 as the opening operational year and 2038 operational year plus 10 years. The traffic modelling methodology has been discussed and agreed with Cambridgeshire County Council as Local Highways Authority. Otherwise, further details on traffic, including modelling, are set out in the Environmental Statement submitted with the DCO Application.

7.0 Further comments –

1. Details of traffic assessment and proposals are provided in the DCO Application.
2. Sludge collection will come from within the Cambridge wastewater catchment and adjoining regions.
3. The Project Description estimates the potential vehicle movements to the site. There are 60 vehicle movements estimated (i.e., 30 journeys) per day of office staff who are involved in the operations of waste water recycling. There are 4 vehicle movements estimated (i.e., 2 journeys) per day for visitors.

8.0 Landscape and Visual plus Lighting – page 9

Bund height – Following Phase Three Consultation responses, the design has been reviewed to further mitigate visual impact. The bund height needs to be considered alongside the other amendments that have taken place to the infrastructure and internal levels of the site. The number and height of the structures within the earth bank have been significantly reduced.

The layout of the taller elements has been adjusted so that these are clustered, reducing the massing and the extent of views affected. The ground level inside the earth bank has been lowered by 1m and therefore the 5-metre earth bank is the equivalent of a 6m screening barrier compared to that shown during Consultation Phase 3.

The design approach has therefore aimed to find the right balance between the height and mass of the earth bank and its screening function. The higher the earth bank the more it will screen but the greater the impact the earthwork itself will have on the landscape and historic environment. From existing ground levels in the wider context, a 5m high earth bank will be perceived as a long, linear form in the landscape which, from all but the closest locations, will not appear above the skyline. It will be integrated into its landscape setting with woodland, scrub, trees, hedgerow, and meadows softening its profile and appearance. A 7m high earthwork would be more prominent in close views than a 5m high earthwork but would not have a noticeably greater screening effect when viewed from more distant locations because the tallest elements on the proposed WWTP would remain visible above the earth bank.

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Through the process of a Landscape and Visual Impact Assessment (LVIA) we are confident that there would be no reduction in the significance of landscape or visual effects of the development with a 7m high earthwork compared with the 5m high earth bank.

Planting – Following Phase Three Consultation responses:

- We are adding larger trees (heavy standard trees and some semi-mature trees) to the early planting and woodland edges, instead of just whips and transplants.
- The current planting scheme includes dense planting, including a mix of semi-mature trees (5 to 8m apart), young standards (3 to 5m apart) and whips planted into hedging species (2m spacing). The whips and hedging will be tied to a post and wire supporting fence. We have included climbers such as Honeysuckle and Bryony.
- We will consider seasonality when deciding upon optimum planting time.

Lighting - We are working with the National and Local Highways Authorities to agree lighting proposals that balance safety and visual impact. A Lighting strategy is included in the DCO Application. There is no intention to illuminate the site at night, only urgent task lighting will be used. The photomontages included with the DCO Application illustrate the outline of visible structures. A colour palette for finishes and material options is also provided with the DCO application.

9.0 Noise and Vibration – page 10

The Construction Noise Assessments have been included as part of the DCO Application. Pipeline working hours will be within normal working hours when construction is within proximity of dwellings. We have, as mentioned above, included in the DCO Application, a Community Liaison Plan that will set out how the community can contact us if there are any issues with working hours, together with a Community Liaison Officer who will work with the community to ensure that construction impacts are mitigated.

Otherwise, we confirm approvals with the Local Authority under Section 61 are still under discussion. We are committed to actively reducing noise emissions, using solid hoarding and other control measures in the COCP. We do not believe noise insulation will be required; it is also unlikely HDD sites will be 24 hrs unless there are unforeseen circumstance.

A commitment to reducing noise from nighttime operations by postponing deliveries/spoil removal to engineering hours and minimising use of reversing alarms at night. We do not propose to move spoil at night, reverse alarms will be minimised where residents are close by.

10.0 Odour – page 11

The Odour Chapter of the Environmental Statement provides further information on the odour modelling undertaken, and all wind directions have been included in the wind rose and odour assessment. Otherwise, there will be no impact of odour on residents or the landscaping because of the gaps within the earthwork bank.

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11.0 Biodiversity – page 12

Damselfly and Hyptomenera - We note your comments with regards to Variable Damselfly (Coenagrion Pulchellum) and can confirm that invertebrates are considered in relation to habitat loss and new provision. This species will have new habitats created suitable for its use through the ditch creation (an added benefit) as well as retained habitats (ditches) currently available. With regards to Hyptomenera, collected data will be reviewed against current conservation status.

Skylarks - We note the comments with regards to skylarks, which we addressed at the time the issue was raised with members of the community. We can advise that our experts were aware of the skylarks, our qualified ecologist surveyed the area in advance to ensure that nesting birds were not present in the vicinity of those works prior to commencement. Those ecological checks were logged in accordance with our environmental and ecological protocols, which are always strictly adhered to by the surveying team. We are therefore confident that disturbance to breeding birds by our survey teams has not occurred.

Fencing - Post construction we are not planning to install animal proof fences other than elements to protect the newly planted trees and internally around the inside of the earthwork bank and at the top of the earth bank.

The final Landscape, Ecology and Recreational Mangement Plan (LERMP) submitted with the DCO Application sets out the management of the site. Those biodiversity elements on the Proposed WWTP site, which contribute towards the 20% biodiversity net gain target set by Anglian Water for the project, will be maintained for a minimum of 30 years, in keeping with the provisions of the Environment Act 2021. The requirements in the LERMP will be approved by Natural England and the Local Planning Authority. Irrigation plans are set out in the LERMP.

12.0 Carbon – page 14

There was an error on the information on solar power information, it should have stated approx. 7 Giga Watt Hours per year. Solar Panels will be set within the inner slope of the earthwork bank. The Carbon chapter of the Environmental Statement includes decommissioning of the existing Cambridge WWTP, construction of the proposed site WWTP (embedded carbon in materials), land use change (the net impact land permanently required for the Proposed Development), and operation of the proposed WWTP.

Demolition of the existing Cambridge WWTP is not included within the Carbon chapter of the Environmental Statement. The demolition of the existing Cambridge WWTP is not part of the scope of this proposal, that work will be completed by the future developer and considered as part of a separate planning application. It is likely to include the effects of emissions from plant used in demolition and should consider the re-use of materials including secondary aggregate, recovered steel and other equipment. The wider effects of changing the existing Cambridge WWTP are also covered by a separate strategic assessment included as part of the application.

We will continue to monitor and report the annual operational footprint; the proposed development will form part of this monitoring and reporting. Monitoring is required in relation to annual carbon accounting in accordance with mandatory reporting to Ofwat of operational emissions for 2021-22 onwards.

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13.0 Climate Resilience – Page 15

Further information on climate resilience is provided in the climate change chapter of the Environment Statement as part of the DCO Application.

14.1 Water Flows – page 17

The Project Description (provided within the DCO Application) sets out the approach to sizing and phasing of the Proposed Development and assumptions made in relation to the period between year 1 of operation and 2050.

We have worked with the Environment Agency, as the regulator, to define and agree the treatment capacity and dry weather flow as part of the discharge permit application. The river model report provides details of predicted water levels and flow rates at various locations along the river (including Bottisham Lock) for a range of flood conditions with the following return periods: 1 in 2, 1 in 10, 1 in 20, 1 in 30, 1 in 50, 1 in 75, 1 in 100, 1 in 200 and 1 in 1,000 years. The potential impacts of climate change (with 20% uplift in flow rate) has also been considered. Future benefits to river quality would be dependent on the actual impact of climate change at low flows. The report does not specifically refer to Q95 flows as the report was looking at flood conditions.

Storm water – We have modelled network performance at 1:100 years plus 20% condition as standard, this results in the TPS being able to pump 7000 l/sec in a storm event, which is split between 2000 l/sec FFT (full flow to treatment) and 5000 l/sec storm flow to storm tank. The modelling for storm performance predicts no CSO discharges from the WWTP. Water supplied in low flow will not be sourced from drinking water it is usual to recirculate effluent within water treatment facilities.

In normal operations the surface water drained from within the proposed WWTP will be contained within the earthwork bank. In exceptional circumstances, should there be high ground water levels and an extreme rainfall event, there is the potential to utilise the Ridge and Furrow feature within the landscape masterplan to attenuate and absorb the water as a natural solution to surface water management. We are working with the Lead Local Flood Authority (LLFA) to establish how this is best applied.

There will be no emergency overflow outlet from the Waterbeach pipeline. All waste water will be transferred to the proposed WWTP for treatment. We are confident that assumptions that have been used in storm water modelling provide an accurate basis for modelling future storm water flows. The application includes a Flood Risk Assessment (FRA) that includes a consideration of the area in Waterbeach benefitting from defences. Fluvial modelling completed as part of the assessments for the Proposed Development included the preparation of flood outlines which account for the mitigating effects of existing flood defences.

14.2 Water Quality – page 18

Details with regards to capacity within the bund for future expansion is provided as part of the DCO Application in addition to the impact assessment on water quality and the surface drainage strategy.

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Otherwise, we confirm:

a. The Habitats Regulation Assessment is included in the application.
b. The Environment Agency continuously review the process and the applicant will adapt the operation accordingly in the future to ensure capacity with changes in climate. There is space for expansion to accommodate increases in capacity, further information is set out in Chapter 2 of the Environmental Statement (project description) and design plans.
c. All pollution pathways will be prevented from connecting to Black Ditch, the risk is assessed in the Environmental Statement Chapter, Water Resources.
d. Effluent used for pipeline or pressure testing will not be discharged to drains connected to the Black Ditch.
e. A Surface Water Drainage Strategy is included in the DCO application.
f. In discussion with the Environment Agency, we have identified and agreed where it is appropriate to enter into non derogation agreements in relation to private boreholes. The CoCP includes a suite of measures in relation to the protection of water resources and also requires that the work complies with all legal requirements, including instances when dewatering permits from the Environment Agency are required.

Historic Environment - archaeological remains - page 19

The archaeological remains within the Quy estate (including the known Roman site) are outside the scheme's study area. Their presence or absence will not affect the archaeological potential of the scheme area. All of the available datasets have been used, there has been consultation with the Cambridgeshire Historic Environment Team and there has been a geophysical survey and trial trenching to identify the archaeological potential of the scheme area. We have considered the potential setting impacts on Quy Hall but have identified that there is no intervisibility with the scheme due to intervening vegetation and topography.

Land Contamination - page 20

The Land Quality and Material Resources and Waste Chapters of the Environmental Statement include reference to historic land use including landfill and the implications are considered in each of these chapters.

Waterbeach pipeline - page 21

The route suggested is not the optimum route Waterbeach pipeline corridor and will not reduce traffic on Horningsea road.

Shaft 4 - page 21

In response to stakeholders comments, as set out above, we have conducted a further assessment. As a result, the ventilation shaft has been relocated further east to reduce potential impact, the construction technique will be (horizontal directional drilling) and the shaft will now be temporary for construction so no permanent vent will exist adjacent to Poplar Hall.

Changes to roads and pathways - page 21

We are confident that the pathways included in the design provide the greatest opportunity for improvements in recreation and connectivity. We have considered the alternative pathway suggested by FDPC and following further assessment will retain the existing new bridleway proposed utilising the old railway line. Construction traffic will use the northern section of Low Fen Drove Waw (LFDW) for a short period whilst the main access is being constructed. Otherwise, use of LFDW will be for minor works on recreational paths and minor landscape works.

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2.2.2 Green Belt – page 22

As part of DCO Application we have provided evidence of the special circumstances for building on Green Belt with the submission of a full assessment of the need of the proposed development in accordance with the National Policy Statement for Waste Water and the national planning policy for Green Belt (as set out in the NPPF), local development plan policies and Cambridgeshire and Peterborough Combined Authority's (CPCA) performance indicators.

Appendix I – Save Honey Hill Response – Cross Referenced – pages 22 – 40

We note that the material in Appendix I was prepared by a resident and included in the consultation response submitted by the Save Honey Hill community group. We are providing a response to the Save Honey Hill group. We have fully considered all comments provided by all stakeholders on landscape mitigation, during development of the project and formally as part of the Phase Three Consultation. The viewpoints with a sub set of photomontages were discussed with the Technical Working Group (TWG) for Landscape and Heritage. The locations were then adjusted based on the feedback from the members of this group. Prior to this, walkovers took place alongside initial ZTV models and GLIVIA3 guidance to understand locations where the Proposed Development could be viewed from. Parish Council input and Save Honey Hill responses (Appendix I) have been considered and taken into account. Therefore, the Applicant is confident that there has been a comprehensive methodology put forward that has taken on board stakeholder feedback for assessing visual impact.

Thank you again for your detailed response and ongoing engagement with the project. As you are aware, we submitted the DCO application on 31 January to the Planning Inspectorate (PINS) for acceptance. We have since had constructive early discussions with PINS, and as a result we've asked them to pause the processing of our application while we provide them with some further information.

This is not entirely unusual with an application of this complexity, and we intend to provide the information within a matter of weeks. We don't believe it will have any impact on the overall timescales for the project.

All documents will be published once the application is accepted for examination. At this stage, the public will be able to register with the Planning Inspectorate and provide a summary of their views of the application in writing by submitting a 'Relevant Representation' in order to become an Interested Party. If you require any further information in the meantime, as always, please do not hesitate to contact me.

Yours sincerely,

K E Barclay

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