

Quy Fen Trust – Relevant Representation – 15th July 2023

1.0 Introduction:

1.1 Stow-Cum-Quy Fen is a Site of Special Scientific Interest (SSSI) located between the villages of Stow-Cum-Quy, Horningsea and Fen Ditton. Quy Fen Trust is the voluntary organisation responsible for preservation and upkeep of the fen.

2.0 Document review:

2.1 The review timescales are noted as being challenging for a voluntary organisation.

2.2 The documents reviewed appear to have a number of inconsistencies, making correct understanding of the application and a proper assessment within the available timescales a limiting factor, necessitating a more thorough review.

2.3 The Trustees welcome the opportunity to submit this Relevant Representation but given the emergent nature of the Anglian Water application, the Trustees wish to reserve the right to raise further concerns as the review process progresses.

3.0 Inappropriate development:

3.1 The trustees of Quy Fen wish to object to the Anglian Water (AW) application for a Development Consent Order to relocate the Cambridge Waste Water Treatment Plant to the area between Horningsea, Fen Ditton and Stow-Cum-Quy, known as Honey Hill.

3.2 Quy Fen and the surrounding areas of Green Belt should be protected and preserved for the wellbeing of current and future generations and free from impact as a result of the Waste Water Treatment Plant relocation.

3.3 The 'very special circumstances' required to justify relocation of a functional treatment works to this Green Belt location have not been met. Other options exist for development of North East Cambridge and for the provision of housing and jobs that do not require development in the Green Belt, which is inappropriate and by definition harmful.

3.4 The area of greenbelt proposed for industrial development, has been the subject of robust protection by South Cambridgeshire District Council through its plans, policies and Green Belt Assessments, the most recent being the Greater Cambridge Green Belt Assessment, which sets out the 'Very High Harm' that would result from development at this location.

3.5 The Trustees do not support Anglian Water's interpretation of National Planning Policy set out within Planning Statement document 7.5, the corresponding independent Green Belt Study, or the suggestion that the relocation is of national importance.

4.0 Pollution:

4.1 Stow-Cum-Quy Fen is a registered Site of Special Scientific Interest (SSSI) which must not be subjected to risk of pollution.

4.2 The foot print of the proposed Waste Water Treatment Plant (WWTP) relocation site has ground level of between 9.0mAOD and 10mAOD with surface water flowing towards the existing network of

land drainage ditches feeding into Black Ditch at circa 5mAOD, which drains in a northerly, then north easterly direction into the Enterline ditch along the boundary of Stow-Cum-Quy Fen.

4.3 The earlier Preliminary Environmental Information Water Resources document (Page 14: Figure 2) issued under the Anglian Water Phase 3 Consultation stated that Aquifer vulnerability mapping indicates that the proposed WWTP is located in a high-risk area in which pollutants may be easily transmitted to groundwater, accidental spills or leakages to ground during operation of the proposed WWTP could give rise to contamination in the Grey Chalk underlying the proposed WWTP.

4.4 The subsequent AW Contaminant Transport Model (5.4.20.8) states *'some grassland areas of Stow-Cum-Quy Fen SSSI, together with waterbodies within these areas, are in connectivity with the Black Ditch under high-flow conditions only. Therefore significant dilution would occur before the contaminants were able to enter these receptors. However, any contamination reaching Black Ditch could affect water quality in the sections of Black Ditch located within Stow-Cum-Quy Fen SSSI. This would include water quality in a pond in the northern corner of the SSSI through which flow in Black Ditch passes.'*

4.5 The document further states that although the groundwater flow was calculated to be in the region of 3.15 l/s, based on the simulated models with estimated values, inorganic determinands could take >1000 years to reach receptors such as Stow-Cum-Quy Fen and that with a higher flow the concentration of any potential impacts would be diluted and therefore the risk of contamination is reduced. However, the *'model assumes that any contamination would result from normal site operation and not a failure incident resulting in significant contamination, due to the unlikely nature of these events'*.

4.6 It is also understood that land drainage may need to be modified within the proposed WWTP and that aspects of the land drainage network within the proposed WWTP may need to be reconfigured during construction to prevent the potential for a rapid transfer of contaminants from any accidental spills or leakages to surrounding surface water features with potential for a change in contributions to flows in local drains connected to Black Ditch.

4.7 The Trustees remain concerned regarding water quality and the potential for any contamination of Black Ditch to affect the sensitive notified features of the SSSI, therefore suggest that the design, construction, management and operational management must guarantee protection from the risk of pollution from either surface or ground water contamination as part of any proposed relocation.

5.0 Impacts on Amenity value:

5.1 The proposed relocation classifies footpath users as low sensitivity receptors, which diminishes the amenity value of the additional footpaths and bridleway proposed, in addition to creating new odour impacts to existing public rights of way.

5.2 The lighting information is insufficiently clear to allow determination. The lighting Design Strategy (Document 5.4.2.5) aims to only have constant lighting below 5m but has task lighting present at substantial heights for maintenance on an as required basis in addition to airport lights on high structures. Construction heights of operational buildings, such as the gateway building and workshop, are substantial and extend in some cases significantly above the height of the 5m bund. If these buildings are used and lit internally at night, such as the workshop, they have the potential to generate significant light pollution above the bund height.

5.3 It is stated that the Gateway building will not be lit as a decorative feature and assumptions are provided on the level of glazing for the DCO application design, with mitigation on the west, south and north facades, but none to the east facing the plant. Para 3.2.3 of The lighting design strategy states one of the most likely sources of lighting during the operation to be "*Lighting of the gateway building and the car park external to the proposed WWTP earth bank*". It is unclear what may be visible post mitigation at the maximum limit height, or unmitigated from the North East.

5.4 No lighting information appears to be provided for the workshop which has a maximum limit height of 10m above FGL, therefore substantially above the bund and has clerestory windows all along both sides of its maximum limit length of 70m. The workshop may only be used in office hours but this is not stated and the site is proposed to be used on a 24 hour basis including deliveries at night. Workshop lighting should be clarified to allow the level of potential light pollution to be assessed.

5.5 Only preliminary high level information appears to be available in the Project Description (5.2.2 – para 2.9.8) for the street lighting at junction 34.

5.6 The Noise and Vibration assessment addresses night time operational plant noise but night time operational transport noise does not appear to be included and reported in the assessment. As 30% of HGV transport is understood to take place at night time this inclusion is expected.

5.7 Anglian Water needs to demonstrate that the impact on amenity of the proposed development will be a no worse situation than at present.

6.0 Recreational impacts:

6.1 Mixed views are provided in the consultation responses regarding the new rights of way and access proposed and the potential for resulting recreational impacts on the Quy Fen SSSI. The wider access proposals appear to have some merit, but access management, signage and other measures will be required to fully mitigate potential adverse impacts. Some respondents have suggested that physical barriers may be required. It has been proposed for AW to review this with Natural England and Quy Fen Trust on an annual basis for the first 5 years.

6.2 In the absence of a published Commitments Register (7.10) clarity is required regarding ongoing funding commitment to support any implementations required through the 5 year period to prevent adverse impacts on the Quy Fen SSSI.

7.0 Landscape – Impacts on the visual amenity:

7.1 The footpaths and bridleways leading to Stow-Cum-Quy Fen SSSI are vulnerable to impacts on the visual amenity from the proposed works through both visual intrusion and night time light pollution. Document 5.3.15 Book of Figures Landscape and Visual Amenity Figure 15.4, shows the proposed site to be elevated by circa 10m from Stow-Cum-Quy Fen and the surrounding landscape, with the Zone of Theoretical visibility in year 1 of operation, Figure 15.1, highlighting the very open fenland landscape to the North East of the proposed site, towards the Fen and its surrounding footpaths and bridleways.

7.2 Predominantly Bridleway 130/8 and footpath 130/6 are the worst affected by visual impact, but to a lesser degree 218/6, 85/12 and 218/5 also have occasional impacts.

7.3 Viewpoints 29 and 30 provide limited value in terms of assessing visual impact from the proposed works. Viewpoint 29 instead of pointing South across the open fenland towards the proposed site, is pointing South East. Viewpoint 30 points west and while offering a view of the proposed pipeline route, offers limited value in terms of views of the proposed site location.

7.4 Viewpoints 31 from Allicky Farm / Bridleway 218/5 and viewpoint 32 from Stow-Cum-Quy Fen and footpath 218/8 are shown with only limited views of the proposed site.

7.5 Document 5.4.15.1, Montage location 7 offers a partial view of the proposed site. The montages are generally of poor quality with grey sky views. While this reflects some winter days, it offers a more limited ability to assess likely impact. The existing view on page 35 incorrectly denotes Fen Ditton as Horningsea.

7.6 The montage location 7 views clearly show the potential for light pollution from the buildings (gatehouse and workshop) proposed, as highlighted above.

7.7 The assessment would benefit from an additional montage view from further West along the same footpath 130/6 to allow assessment of the full site which is extremely open and does not appear to be fully mitigated by the planting.

7.8 The proposed site must not be visible from Quy Fen through visual intrusion or light pollution / night glow and visibility from the paths leading to the Fen should be minimised. This does not currently appear to be the case.

8.0 Design:

8.1 While the finished ground level has been reduced by circa 1m compared to earlier consultations, the bund has also been reduced to 5m in height. Some building heights have been reduced but the height of the tallest plant remains largely unchanged.

8.2 The proposed site is placed on elevated ground compared to the surroundings in an area with the least existing mitigation. The cheapest solution has been sought in a location where additional mitigation and reduction in height through the lowering of plant into the ground is stated to increase vulnerability to ground pollution.

8.3 The height proposed for the tallest plant is inappropriate for the fenland setting and is damaging to the character of the landscape.

8.4 The intention regarding placement of solar panels and corresponding visual impact is unclear. Consultation Response Summary Document 6.1.3 (p66) records concerns raised by Quy Fen Trust regarding the lack of information to allow review and assessment of visual impact of elevated solar panels on building roofs and above car parks. The AW response confirmed that “the placement of solar panels is on the inner facing slope of the earth bank”, which aligned with the Phase Three Consultation material. The Project description now contradicts AW’s consultation response (Document 5.2.2 para2.10.3) stating that solar panels will be on building roofs and over parking spaces, on the workshop and gateway building roofs (2.13.9 / 2.13.4) and are shown on the gateway drawing (4.10.1). Anglian Water’s plans are therefore unclear in this regard.

9.0 Building Limits:

9.1 There is a lack of consistency regarding the building limits proposed, prohibiting clarity of review. The Design Plan 4.10 drawing dimensions and corresponding Limits of deviation do not appear to match those set out in the Project Description (5.2.2) or requested in the corresponding Draft Development Consent Order Schedule 14 Parameters.

10.0 Access:

10.1 The Trust notes that the necessary provision for continued access to the Fen via footpath 130/8 has been included in Draft DCO Schedule 6 Public Rights of Way Part 1) Public Rights of Way to be temporarily closed for which a substitute is to be provided.

10.2 This is welcomed as trustees, contractors and graziers require uninterrupted access to the Fen. It is noted that 130/8 is a bridleway, incorrectly stated as a footpath in multiple places.

11.0 Biodiversity:

11.1 The proposed development impacts on the wider Cambridge Nature Network and Wicken Fen Vision, specifically impacts on Quy Fen's connectivity to other habitats in the wider landscape. The AW proposals do have the potential to enhance the wider nature network and ecological setting of Quy Fen, though for avoidance of doubt, not its landscape setting. This is not going to override the wider concerns held by many Quy Fen Trustees that should be offset by an enhanced level of mitigation, in addition to delivery of significant Biodiversity Net Gain.