

## **Quy Fen Trust Written Representation – 17th November 2023**

### **1.0 Introduction:**

- 1.1 This Written Representation is made by the Trustees of Quy Fen Trust (QFT) and supplements Relevant Representation reference RR-034, dated 15<sup>th</sup> July 2023.
- 1.2 The QFT responses to the Examining Authority's First Written Questions (ExAQ1) are captured within the attached Appendices; with Biodiversity, Recreational pressures and Pollution addressed in Appendix 1 and Lighting and Landscape within Appendix 2.
- 1.3 The preservation and protection of Quy Fen, a designated Site of Special Scientific Interest (SSSI) is of particular interest to the three villages and local communities most impacted by the Proposed Development (PD): Fen Ditton, Horningsea and Stow cum Quy.
- 1.4 Quy Fen is an important historical characteristic of the three villages which forms a shared historical landscape and contributes to the local community's sense of place and setting. The Fen spans approximately 73 acres and is the remains of a much larger area of common land shared amongst the three villages. The three parish boundaries culminate in close proximity to the Fen. A series of footpaths (PROW's) and bridleways provide access to Quy Fen from each of the villages across fields and, in the case of Fen Ditton the riverside, incorporating Baits Bite Conservation Area.
- 1.5 Quy Fen is highly valued by the local community for its recreational value and quality of setting. For many Quy Fen is a recreational oasis; it is accessed away from roads and vehicles and leads on further via a network of paths to National Trust managed land, Anglesey Abbey and Wicken Fen.
- 1.6 Today it is managed by Quy Fen Trust on behalf of the three parishes comprised of local people including two representatives nominated by each of the Parish Councils and an ecological advisor. The trustees are supported by Natural England (NE) in safeguarding, managing and furthering the fen as a SSSI.

### **2.0 Inappropriate development**

- 2.1 Expanding further on the concerns raised within RR-034, the need for the proposed development is far from assured.
- 2.2 The information provided in the Applicants Statement of Requirement, document 7.2, PINS reference APP-210, addressing the proposed solution for the Waterbeach Water Recycling Centre (WRC) is very limited. It reflects that little investigation has taken place between the Developer, the Applicant and the corresponding stakeholders to address WRC solutions for Waterbeach New Town and not seemingly at a level to justify the intrusion and permanence of the proposed pipeline. It is noted that a pumping station will still be required to serve the pipeline. An alternative solution for Waterbeach WRC or a more direct route for the proposed pipeline between Waterbeach and the existing Cambridge WRC would reduce the potential to affect Quy Fen SSSI.

2.3 No comprehensive information is available regarding options properly considered for retention of the Cambridge Water Recycling Centre (CWRC) in its current, or a consolidated improved form, on the existing site.

2.4 As a consequence, no overall comparison or assessment is available of the quantum of development that could still be achieved with retention of separate plants, without either the Proposed Development (PD) or connecting pipework to pump WRC effluent upstream to the PD.

2.5 The proposed location for CWWTW, selected through the Applicant's process, is not considered appropriate. The primary selection criteria used was cost, resulting in a proposed location within the green belt on the city edge, which is elevated, has least existing landscape cover and limited opportunity to submerge aspects of the site due to geological conditions.

2.6 In the absence of an assured need case, insufficient justification is provided to warrant the impact on the openness and permanence of the green belt.

### **3.0 Carbon**

3.1 A range of carbon assessments have been included within the Applicants submission exploring the carbon effects of the development and comparing various scenarios. However, in the absence of a proper assessment that considers the option of retention of both the WRC and CWRC on their existing sites, in a current or improved form, as a baseline and compares to the carbon footprint of the PD in its entirety, a true carbon impact assessment cannot be provided. Such an assessment would allow comparison to the quantum of housing and mixed development that could be delivered without the corresponding environmental impacts.

### **4.0 Pollution**

4.1 Questions raised by ExAQ1 and the Environment Agency (EA) are welcomed by QFT and are suitably addressed by QFT ExAQ1 response (Appendix 1). However, more generally QFT has wide ranging concerns regarding the potential risk of pollution reaching Black Ditch and the corresponding potential for transmission to Stow-cum-Quy Fen SSSI. While monitoring boreholes and water quality in the attenuation pond offers a level of mitigation, the QFT preference would clearly be for prevention.

4.2 The Applicants Drainage Strategy Document 5.4.20.12, PINS reference APP-162, identifies 36% of the PD core site drainage surface area as potentially contaminated and therefore drainage will return to the head of the works for treatment. However, the remaining 64% is considered to be uncontaminated and therefore drains to the attenuation facility for onward transmission to the drain connecting to Black Ditch and in turn the pond north of Stow-Cum-Quy Fen.

4.3 Wide ranging documents, such as those dealing with Odour and Odour Management refer to spills generally, including roadways and other areas not confined to the 36% of the site for which drainage returns to the head of the works. QFT would also welcome surety regarding the site drainage in addition to the sub-surface drainage network and other matters addressed within ExAQ1 and the corresponding QFT response. The Applicant states that a drainage strategy will be agreed once consent is granted, which is too late.

## **5.0 Landscape**

5.1 QFT welcomed the notification of the Unattended Site Inspections that took place on 18<sup>th</sup>/19<sup>th</sup> September 2023 and that the ExA had visited viewing points 29 to 32 inclusive and 13 to 16 inclusive. As Quy Fen is common land and the approaches to the fen have a broad range of footpaths it is assumed that the Ex A has sufficient access to conduct any viewing required. However, requests for further access will be supported by QFT as required. QFT ExAQ1 response on landscape and lighting are included in Appendix 2.

## **6.0 Impacts on Quy Fen**

6.1 QFT is concerned regarding the potential impact of visitor pressure on the Quy Fen SSSI.

6.2 These views are shared by Natural England, who note recent evidence of the damaging effects of visitor pressure on the sensitive habitats within Quy Fen and that new or enhanced public access opportunities arising from the PD and cumulative impact from housing developments underway and proposed, including housing developments at North East Cambridge should the PD proceed, will further the potential for recreational pressure impacts (NE EIA Scoping Opinion 18-11-21; NE RR-015, 19-07-23).

6.3 Natural England have been critical of the adequacy of the assessment undertaken by the Applicant of Quy Fen SSSI in relation to the impact of recreational pressure; mitigation measures and monitoring of the effect of those measures so far proposed (NE RR-015, 19-07-23).

6.4 Furthermore, Natural England have stated it would like to see 'the project deliver a more strategic contribution towards the Cambridge Nature Network to enhance the natural environment and improve its resilience to development pressures'. It believes scope of the LERMP should be extended to cover the entire project area and for this to include ecological mitigation, enhancement (including BNG) and management across the wider project area (NE RR-015, 19-07-23).

6.5 The National Trust share the views of QFT and Natural England in relation to the potential harm the PD would have on the habitat of Quy Fen SSSI arising from increased recreational pressure; the inadequacy of proposed mitigation measures and also proposes a broader approach beyond the core site to mitigation measures and the creation of alternative green space (NT RR-031, 19-07-23).

6.6 Damage to Quy Fen SSSI as a result of increased recreational pressure arising from the PD would be contrary to local and national planning policy. Further, any degradation of status would impact the contribution it makes to the purposes of the Green Belt as a designated asset and the role it has in the character, setting and identity of the villages of Fen Ditton, Horningsea and Stow cum Quy all of which are features identified as contributing to the setting of Cambridge (SCDC LP 2018; Inner green Belt Study 2015).

6.7 At a working level the prospect of increased visitor pressure places at risk the efforts made by QFT in maintaining and improving Stow-cum-Quy Fen as a SSSI.

6.8 The QFT ExAQ1 response on biodiversity is included in Appendix 1 of this submission.

## Appendix 1

### **CWWTP: Examining Authority First Questions**

**DEADLINE 1: 20<sup>th</sup> November 2023**

#### **Quy Fen Trust response to First Questions**

The Quy Fen Trust are responsible for the management of Quy Fen, which is also common land and a SSSI (Stow-cum-Fen SSSI). The Trustees submitted a Relevant Representation (RR-034) and raised a number of concerns over a range of subjects and impacts on Quy Fen and its setting.

The Quy Fen Trust Relevant Representation raised concerns regarding Biodiversity (point 11) and Recreational Pressures (point 6.0) which are both linked, as well as concerns regarding pollution (point 4.0).

In assessing the impacts on Quy Fen as a SSSI, our response has been guided by our Trustee Environmental Advisor, Martin Baker, who works for the Wildlife Trust BCN and is a full member of the Chartered Institute of Ecology & Environmental Management (MCIEEM).

The Quy Fen Trust (QFT) notes the questions raised by the Examining Authority and have the following observations.

#### Biodiversity / Recreational Pressures

QFT is pleased to note that our concerns are covered by Natural England and agree with questions ExQ 5.12, 5.13, 7.24 & 7.29 raised.

We support the stance taken by Natural England identifying concerns regarding increased recreational pressures and the potential adverse impact of this on Quy Fen. However, if their suggestion for a post development monitoring approach is taken (pages 18 & 19 of NE's RR (RR-015) was to be taken forward further information and reassurances will be required. This approach can only be effective if the management and enhancement measures deemed necessary to minimise and mitigate impacts on Quy Fen SSSI are deliverable and receive the necessary funding. ExQ 7.29 correctly identifies this and it is the key question for Anglian Water and Natural England to answer.

In our view, the potential package of mitigation measures for Quy Fen SSSI need to be set out now with a clear legally enforceable mechanism for allocating responsibility and funding for their delivery. Potential mitigation measures could include route signage and design of circular and other walking routes walks that avoid Quy Fen SSSI, specific wardening of Quy Fen at key times, and in an extreme situation closure or diversion of new routes, or provision of suitable alternative natural greenspace (SANGS).

ExQ 7.24 correctly asks the question as to whether the proposed new access routes should even be provided. If a potential mitigation scheme cannot be legally guaranteed or delivered through this

DCO application, then perhaps the new access routes bringing increased numbers of people closer to Quy Fen should be excluded?

### Pollution

QFT is pleased to note that our concerns are covered by the Environment Agency and Natural England and we agree with questions ExQ 21.17, 21.18, 21.37, 21.38 & 21.40 raised.

We support the stance taken by the Environment Agency and Natural England. The threat of groundwater or surface water pollution to Quy Fen SSSI must be avoided with negligible risk, taking account of catastrophic failures, during construction or operation of CWWTP.

With respect to ExQ 21.17, while QFT supports the approach to monitoring suggested by EA / NE, identifying problems after the event would be too late for Quy Fen SSSI. The scheme should ideally be designed to avoid any prospect of such pollution impacts. If a risk remains, even if negligible then a monitoring regime must be required. However, it will also be critical to specify the potential mitigation measures and operation changes should a pollution problem be identified. With respect to ExQ 21.37 the monitoring must be undertaken (“should” is not acceptable).

Martin Baker MCIEEM  
QFT Environmental Advisor  
For and on behalf of QFT  
7<sup>th</sup> November 2023

## Appendix 2

### **CWWTP: Examining Authority First Questions**

**DEADLINE 1: 20<sup>th</sup> November 2023**

#### **Quy Fen Trust response to First Questions**

##### Lighting Impacts

Concerns about the lack of clarity on the proposed lighting scheme and potential impact on Quy Fen in the context of light pollution and the impact on nature corridors, habitat and visual amenity, including dark skies were raised in QFT RR-034

QFT welcomes the following:

- ExA's Q's 5.6 on the condition of survey work and impacts of the proposed lighting scheme on the CWS, QFT request this is extended to include the wider landscape and nature network area surrounding and incorporating Quy Fen.
- Natural England RR-015 require further details of lighting arrangements including if lighting will impact on roosts in the area. Further, that they defer to the Local Planning Authority (LPA) for more detailed protected species comments and advice on the Lighting Strategy and subject to this, require potential amendments.
- Natural England RR-015 Part III Table 2 require mitigation measures to be secured via the LERMP (Requirement 11) and that this should be subject to approval by Natural England in addition to the LPA.
- ExA's Q's 5.17 and 5.18 bat surveys and effects of operational lighting on bats including how mitigation measures would be secured.
- ExA's Q's 14.19 and 14.20 regarding the boiler stack flare and lighting emitted from proposed workshop building.

##### Landscape Impacts

Concerns about the quality / value of the Viewpoints and photomontages relating to the impact on visual amenity from within Quy Fen and from the PROW network surrounding it were raised in QFT's RR-034.

QFT welcomes the ExA's Q's of local authorities 14.1 and 14.2 on the selection of viewpoints, methodology and LVA assessment outcome.

QFT notes the limitations of photomontages of buildings (WWTP) set in broad landscapes in representing the scale as viewed from the naked eye (PROW network) . Photographs of Landscape will always portray greater distances and smaller buildings than a person in situ with their naked eye. An assessment of the potential impact on visual amenity and consideration of the accuracy of assessment outcomes in relation to Quy Fen can only be achieved in situ, reference to the photomontages by Local Authorities ie 'desk top' is not sufficient.

- QFT notes
  - SCDC RR-004 view the adverse effects from the proposed landscape mitigation to be greater than expressed in the Applicant's assessment.
  - CCoC RR-01 states the Proposed Development will have a significant adverse visual impact on the landscape from both the new structures and lighting proposed
  - SCDC have concerns about the sustainability of mitigation planting, particularly on top of the 'bund' and propose an alternative is identified in case of planting failure.

The latter would have implications on Quy Fen in relation to visual impact and changed landscape and request in the case of alternatives considered to be consulted.