



**National  
Trust**

██████████@nationaltrust.org.uk  
20<sup>th</sup> November 2023

Online submission: Planning Inspectorate

Your Ref: WW010003

Our Ref: 20041383

Dear Sir/Madam

**Application by Anglian Water Services Limited for an Order Granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation project**

**Procedural Deadline 1 Submission: Written Representation**

This Written Representation is made on behalf of The National Trust for Places of Historic Interest or Natural Beauty (“the Trust”).

As set out in our Relevant Representation ([RR-031](#)), the National Trust has significant land holdings in the locality of proposed CWWTPR site, including Anglesey Abbey (a Grade I Listed Building set within a Grade II\* Registered Park and Garden and an estate which extends to over 46ha) which lies approximately 2.4km to the northeast of the proposed development site. In addition, the Trust owns and manages approximately 800ha of land at Wicken Fen which lies approximately 7.5km north, northeast of the proposed development site. A significant area of this land forms Wicken Fen National Nature Reserve (NNR) and is designated as Wicken Fen Site of Special Scientific Interest (SSSI), and internationally designated as part of the Fenland Special Area for Conservation (SAC) and Fenland Ramsar site.

Beyond its own landholdings, the Trust has an interest in the extensive area of land in the corridor between the River Cam and the B1102 stretching from the A14 in the south to Wicken village in the north. This land is recognised as the “Wicken Fen 100 Year Vision Area” and the Trust, working with partners and landowners, has a long-term ambition to see this 53 square kilometre area managed for nature conservation with improved public access for recreation, community engagement and learning.

This Written Representation expands on, and updates our position on the issues raised in our Relevant Representation, namely:

- Principle of Development and Green Belt
- Landscape and Ecology

National Trust  
Paycockes House  
25 West Street  
Coggeshall  
Colchester  
Essex  
CO6 1NS

Regional Advisory Chair: Carys Swanwick  
Director for the Midlands & East of England: Paul Forecast  
Registered office: Heelis, Kemble Drive, Swindon  
Wiltshire SN2 2NA  
Registered charity number 205846

- Hydrology and Hydrogeology
- Access and Recreation

It does not repeat the matters raised in our Relevant Representation and it is therefore requested that both documents are read alongside each other.

1. Principle of Development and Green Belt Impact

The National Trust notes that these matters were discussed at Issue Specific Hearing 2 (ISH2). The Trust has no further comments in addition to those made in our Relevant Representation at this stage.

2. Landscape and Ecology

Concern was raised by the National Trust in our Relevant Representation that although the Landscape, Ecological and Recreational Management Plan ([AS-066](#)), and Environmental Statement recognises the Wicken Fen Vision and considers compatibility and alignment with the Vision in terms of habitat creation within development boundary, the LERMP only covers the immediate area around the proposed WWTP.

In the first Written Questions which have been issued by the Examining Authority, comments are requested from the Trust on the Commitments Register ([AS-125](#)), which was an additional submission by the Applicant. This document states at ID C58, “The Applicant will continue to engage with Natural England and other stakeholders to consider other opportunities and benefits that can be delivered collaboratively outside of the DCO”. The delivery mechanism is stated as dDCO Schedule 2, Requirement 11 (Landscape, Ecological and Recreational Management Plan). Having reviewed ES Chapter 8 Appendix 8.14: Landscape, Ecological and Recreational Management Plan ([AS-066](#)), the National Trust cannot see any commitment or strategy for doing this.

The Trust remains of the view that the Landscape Masterplan proposals should extend beyond the development boundaries and meaningfully contribute to ecological restoration and enhancement in the southern area of the Wicken Fen Vision area and explore opportunities for working in partnership working to deliver landscape scale enhancements in the context of the Wicken Fen Vision objectives.

3. Hydrology/Hydrogeology

In our Relevant Representation, we set out that our concerns related to the proposed dewatering of the site, the high permeability in the bedrock and the potential for works and operations associated with the development to transmit pollution to groundwater. Also, that we would like to see appropriate monitoring of water levels and water quality on and off-site before construction, during construction and during operation secured to determine impacts on sensitive receptors, including potential pathways to impact our sites.

The National Trust is aware that the Applicant is preparing an Outline Water Quality Monitoring Plan and that it has been discussing this with the Environment Agency. The applicant has shared a draft copy of this document with the National Trust, for which the Trust is grateful. The Trust has reviewed this and provided comments to the Applicant. Notably relating to consistency, commitments, and reporting.

It is understood that this will be submitted to the Examining Authority. The National Trust will provide comments to the Examining Authority on this Plan at a future deadline once it has been submitted by the Applicant.

#### 4. Access and Recreation


In our Relevant Representation the National Trust expressed disappointment that the proposed new section of bridleway to the northeast of the proposed WWTP site does not provide a direct route to Anglesey Abbey. We note that Question 7.24(c) of the Examining Authority's First Written Questions ([WQ1](#)) is directed at the Applicant and queries why the proposed PRoW does not continue further along the dismantled railway towards Anglesey Abbey. The National Trust will review the Applicant's response and respond if needed at a future deadline.

We also raised concerns in our Relevant Representation about recreational impacts on Stow-Cum-Quy Fen SSSI (located in the Wicken Fen Vision area) and how this must be adequately assessed and mitigated if necessary. We note that our comments are sought in response to Written Question 5.13 (Impacts on Stow-cum-Quy Fen SSSI) on the proposed wording set out on pages 18 and 19 of Natural England's RR [\[RR-015\]](#) regarding dDCO R11 to address the concerns regarding the impacts from increased recreational pressure on the SSSI.

As set out in our submitted response to the Written Questions, the Trust agrees that a detailed access monitoring and management strategy for the PRoW and Stow-cum-Quy Fen SSSI secured by Requirement is necessary. However, the strategy should be agreed and approved prior to the commencement of development and include pre-commencement monitoring to establish baseline data. It should include measurable indicators and triggers for mitigation. Furthermore, it is not clear how mitigation would be secured if the results of the monitoring identify that this would be required.

I trust this submission is helpful to the Examining Authority.

Yours faithfully

  
Nina Crabb BSc (Hons), PGDip, MRTPI  
Regional Planning Adviser (Midlands and East of England)