



**National
Trust**

██████████@nationaltrust.org.uk
20th 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: Responses to First Written Questions (ExQ1)

Please find below responses from the National Trust to the Examiners First Written Questions.

Yours faithfully

Nina Crabb

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

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

www.nationaltrust.org.uk

WQ1	Question to:	Question:
5. Biodiversity		
Q 5.13	Applicant, National Trust (NT), Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire (WTBCN), CCoC, CCC, SCDC	<p>Impacts from recreational pressure on Stow-cum-Quy Fen SSSI</p> <p>Do you agree with the proposed wording set out on pages 18 and 19 of NE's RR [RR-015] regarding dDCO R11 and do you consider this would act as a suitable solution to address concerns regarding the impacts from increased recreational pressure on Stow-cum-Quy Fen SSSI ([RR-015] para 4.3.21 and 4.3.22)?</p>
	Response from National Trust	The National 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. It is not clear how mitigation would be secured if the results of the monitoring identify that this would be required.
Q 5.14	NE, EA, NT, CCC, CCoC, SCDC, WTBCN	<p>Comments on updated information submitted by the Applicant</p> <p>Please review and comment on the additional information provided by the Applicant in response to the ExA's Procedural Decision [PD-004], regarding the impacts of the Proposed Development on biodiversity with particular reference (but not limited to):</p> <p>the outline Outfall Management and Monitoring Plan (oOMMP) [AS-073];</p> <p>the draft CEMP [AS-057];</p> <p>Commitments Register [AS-125]; and</p> <p>the Preliminary Ecological Appraisal [AS-072].</p>
	Response from National Trust	<p>Outfall Management and Monitoring Plan (oOMMP) [AS-073]:</p> <p>No comments.</p> <p>Draft CEMP [AS-057]:</p> <p>The National Trust notes that this document was requested by the Ex.A to better understand the</p>

	<p>mitigation measures proposed. The document which has been submitted by the Applicant sets out the structure that the detailed CEMP will take but does not include any substantive detail. It states that a series of phase specific detailed CEMPs will be developed and will be submitted to the relevant local authorities for approval prior to the commencement of the associated phase (in line with dDCO (Doc 2.1), Schedule 2, Requirement 9).</p> <p>Commitments Register [AS-125]:</p> <p>The Commitments Register 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 (PINS Document Ref: AS-066), the National Trust cannot see any commitment or strategy for doing this. This is a matter which was raised in the National Trust’s Relevant Representation (RR-031).</p> <p>Preliminary Ecological Appraisal [AS-072]:</p> <p>Para. 7.1.1 of the PEA states “In accordance with the NPPF, works should not only avoid, mitigate or compensate for ecological impacts, but also seek to enhance biodiversity within the area. Therefore, enhancement measures for the proposed site option should be implemented”.</p> <p>Para.7.1.3 identifies potential opportunities for enhancement, including opportunities to engage in the Cambridgeshire Strategic Green Infrastructure Network (a landscape-scale initiative) and the Wicken Fen Vision area to link habitat creation proposals. It also states that potential measures could include improving landscape connectivity recommended by the National Trust’s Wicken Fen Vision area and the Cambridgeshire Strategic Green Infrastructure Network (strategic network area 6 Cambridge and Surrounding Areas).</p> <p>This recommendation, made by the Applicant’s consultants, accords with comments made in the</p>
--	---

		<p>National Trust's Relevant Representation and Written Representation that the Landscape, Ecological and Recreational Management Plan (LERMP) should contribute towards ecological restoration and enhancement beyond the WWTP site boundaries, within the southern area of the Wicken Fen Vision area.</p> <p>The National Trust considers that a proposal of this scale, on a site within the Green Belt should be contributing significantly more towards green infrastructure initiatives within the wider landscape. We remain disappointed that there are no proposals or commitments within the DCO application to deliver any ecological enhancements beyond the site boundary.</p>
--	--	--