

## Introduction

1.1 This is the Written Representation of Fen Ditton Parish Council in response to the proposed relocation of Cambridge Waste Water Treatment Plant ('CWWTP'). It expands on the issues raised in our Relevant Representation (RR-006) and points raised at Open Floor Hearing 1 and Issue specific Hearings 1 and 2.

1.2 As instructed, references include the document number from the Examination Library. Other documents referenced are listed as footnotes with the exception of the Written Representation of the Save Honey Hill community group (SHH-WR). FDPC supports the SHH community group and will seek to avoid repeating the detailed points they raise.

## 2 Summary (from OFH1, EV-003a)

2.1 FDPC covers over 600 dwellings and the number will continue to rise rapidly as the planned 1300+ homes at Marleigh are completed. A further 7,000 homes to the south outside the parish have been proposed for development after 2030. The parish boundary contains, amongst other features: areas of Green Belt, ecological features, part of the Black Ditch and several well used footpaths.

2.2 FDPC objects to the principle of the proposed relocation to this site

2.3 FDPC objects to the mitigation package currently proposed since more should be done to minimise impacts on the parish and visitors if the relocation were approved.

2.4 FDPC has concerns about missing/contradictory information in the proposals.

## 3 Objections to the Principle

3.1 FDPC objects to the principle of the proposed relocation to this site (Site 3) because:

- i) It will destroy the open, green space nature of the surroundings of the village which are supported by the Green Belt (RR-006) and because new impacts such as odour and visual intrusion during both day and night would be introduced in the east of the parish.
- ii) The evaluation of alternatives is incomplete and, possibly, skewed towards Site 3. The option to stay on site should be considered not least because of the avoidance of capital carbon, which otherwise adds to the climate emergency, and operational carbon due to increased pumping. In addition, staying on site would bring a proper return on the mid-2010s, c.£20million investment in the "D" works which we believe was funded by Anglian Water's customers. Anglian Water should confirm if the evaluation of alternatives to Site 3 considered:
  - the use of intermediate pumping to lessen the depth of tunnelling to minimise any construction in the lower aquifer;
  - the possibility of tunnelling directly under the Science Park for sites west and north west of the existing Cambridge WRC Works instead of the tortuous route evaluated in the site selection stage; and
  - use of a single thickness tunnel thickness lining rather than the assumed double lining where tunnels were expected to penetrate the lower aquifer. The latter point arising because exfiltration of sewage causing groundwater contamination cannot occur when the groundwater pressures are much higher in the aquifer than the fluid level inside the tunnel.

### 3.2 FDPC also objects to the principle of including some components of the Proposed Development as follows:

- i. The Gateway/Office building is intended to provide office accommodation for non-operations staff to be transferred from the existing office off Cowley Road. These staff are reported to exercise a company-wide function and, by implication, are not tied to this or any other WRC. Construction of new offices within the Green Belt should not be permitted under this DCO. FDPC notes that the NECAAP is intended to include new offices and take advantage of good public transport and good non-motorised vehicle commuting possibilities, neither of which are features of the proposed Gateway/Office building. Excluding an office for non-operations staff would allow a smaller Gateway/Visitor building and consequently reduce visual intrusion and light impacts and would reduce queuing on the Horningsea Road bridge over the A14 by removing up to 30 cars daily.
- ii. The Waterbeach pipeline is intended to obviate the need for a separate WRC at Waterbeach. FDPC understands there was criticism of a proposed site located in Floodplain 3 near the River Cam but also of the consideration of alternative locations to that site. The justification for the pipeline solution for Waterbeach should be examined. A temporary pipeline connection to the existing Cambridge WRC is proposed which runs south of the A14 and would be very disruptive for our Parish. We are concerned that Anglian Water's plan to close the Waterbeach WRC or contractual arrangements for the construction of a pumping station could otherwise take precedence over the criterion of rate of completion of residences in the new town. FDPC recommends that the assessment of need for and final decision whether to build this connection is made subject to further approval by South Cambs District Council and Cambridge County Council.
- iii. The proposed STC contains some of the tallest structures. Anglian Water should confirm if they considered export of sludge from the WRC to another site, possibly a third party, for anaerobic digestion and if they have considered alternative technologies with smaller structures for the STC.
- iv. FDPC echoes the concern raised at the hearings by SHH on 17<sup>th</sup>/18 October 2023 that the DCO permits cutting back of hedges and trees if they interfere with use of land within the red line boundary during construction. We suggest considering if the detailed setting out of the land to be used for construction should be controlled if this would avoid the need to for such cutting back. FDPC is particularly concerned about the hedges and trees on Horningsea Road, the Filly Lane byway and Low Fen Drove south east of the disused railway line.

3.3 FDPC is concerned about the possibility of an additional 250,000 homes in the Cambridge area (the Cambridge 2040 plan) recently announced by Mr Gove invalidating the current relocation proposal. Is there a mechanism to recommend this risk is revisited prior to the DCO being determined?

## 4 Mitigation

4.1 FDPC's wishes to highlight a few specific topics in support of the written submission by SHH (SHH-WR).

- i. Drainage Strategy: FDPC welcomes the statement by Anglian Water at the Hearings of 17/18 November that all surface drainage within the bunded area would be pumped back through the works. We support this because it avoids the possibility of

sewerage or other contaminated water from within the bund passing through the SUDS systems outside the bund into the Black Ditch with potential to overflow onto Quy Fen. The design shown on Figure 8.3 of the Drainage strategy (APP-162) is unsatisfactory because it shows that Drainage Areas 3 and 7 will drain to the Black Ditch whose protection is thus predicated on the assumption that these areas will remain uncontaminated. FDPC agrees that this is likely to be true for the sloping surface of the inside of the bund itself but are concerned about the remaining near horizontal surfaces which have been reported to be generally around 1m below existing ground level. FDPC suggests the drainage design may need to be altered and any final discharge permit should not allow any contamination to transfer from within the bund via the balancing pond then into to the Black Ditch. Anglian Water should also commit to reducing pumping at the Terminal Pumping Station or through the Waterbeach pipelines into the proposed WRC whenever it is necessary to prevent overflows of sewage within the bund. Although the design would avoid such overflows under design conditions, it should be prevented also under out-of-design conditions such as emergency or accidental conditions.

- ii. FDPC is concerned that although the presence of some rare and endangered species, including Variable Damselfly (*Coenagrion Pulchellum*) and *hymenoptera* is noted in the Preliminary Ecological Appraisal (AS-072), it is unclear if their habitats along Low Fen Drove have been clearly identified and provision made for their protection. The DCO should contain provision to reduce the use and potential for future use of the byway as a route for traffic between Horningsea Road and High Ditch Road or excessive redevelopment to support the proposed public access along the disused railway.
- iii. FDPC is concerned about odour problems from the PD affecting residencies that currently do not experience them. The Odour Management Plan (AS-106) indicates that additional control measures might have to be retrofitted if required. Noting that some components of the PD would be uncovered (Table 3-1, AS-106), FDPC suggest Anglian Water advise how much extra height might be needed if covering is required in future and whether this would be visible above the hedging on top of the bund.
- iv. FDPC is concerned about the proposed mitigation for visual intrusion. Anglian Water should state the elevation of the top of the bund for comparison with the top of structure elevations listed in Sections 2.3 and 2.4 of the Project Description (APP-34). This matters because, for example, the PSTs listed in Table 2-6 would reach 15.5m AOD (6m above FGL) and would be partially obscured from the south and west by the FST's listed in Table 2-8 which would reach 18m AOD (9m above FGL) over a total frontage of at least 160m and from the north west by the ASP tanks listed in Table 2.7 which would reach 17m AOD (8m above FGL) over a total frontage of at least 40m. In a letter dated 16<sup>th</sup> March Anglian Water informed FDPC that the reduction in proposed bund height from 7m to 5m over the course of the consultations was offset because "...ground level inside the earth bank has been lowered by 1m...". FDPC agrees with the principle of taking into account the ground lowering but requests the ExA to direct that the finished bund level is raised by an additional 1m relative to original ground level since this would reduce the number and frontage of structures visible above the bund and, in time, above the proposed hedging and other vegetation on the bund.
- v. FDPC considers the length and duration of the proposed diversions of footpath 85/6 along the bank of the River Cam north of Green End should be reduced. This is a well

used path passing through Fen Ditton and Baits Bite Conservation Areas. Anglian Water should provide a shorter temporary route between points R1 and R2 on Rights of Way Plans Sheet 2 (AS-153) and confirm if the footpath crossing of the discharge pipeline and associated construction roads will be manned in working hours and left open otherwise. This arrangement appears to have been successful in the Parish where constructions routes within Marleigh crossed cycleway NP51.

- vi. FDPC is concerned about possible use of roads within the built up areas of the Parish by construction and operational vehicles whilst welcoming Anglian Water's commitment to avoiding their use. Five points stand out:
- FDPC welcomes the design change where Shaft 4 of the Transfer Tunnel is to be a temporary shaft and not a permanent shaft since, amongst other benefits, this avoids the need for permanent access to the shaft.
  - As reported by FDPC at the Hearings of 17/18 October, eastbound traffic on the A14 occasionally diverts at Quy Roundabout (J35), along Newmarket Road through High Ditch Road or Ditton Lane to pass northwards or eastwards from J34. This occurs when the eastbound A14 is blocked or congested and leads to weight limits being ignored. Anglian Water propose a management regime to avoid vehicles accessing the proposed WWTW through the built up area. FDPC is concerned this may be insufficient and proposed a hard, legally enforceable as described below.
  - FDPC welcomes the statement in para 2.9.5 last bullet, second sub bullet of the Project Description (APP-34) that, as requested by FDPC, the project would consider "...no right turn from Horningsea Road into the permanent access road". ExA is requested to overturn its omission from Schedule 9, Part 2 of the Draft DCO (AS-139) since this would also reduce congestion on the A14 overbridge.
- vii. FDPC requests ExA to direct the Applicant to ensure that FDPC is a consultee within the Community Liaison Plan (AS-132) process or similar. This will allow the Council to contribute and be kept informed about the Project.