

**CWWTPR DCO Examination**

**Submission by Save Honey Hill Group 6 December 2023**

**SHH 28 SHH Comments on Applicant’s Responses to ExA’s ExQ1 REP1-079**

Save Honey Hill Group’s responses follows the structure of the Applicant’s document REP1-079.

REP1-079 Section References	SHH Response	References to SHH or Other Submissions
2.17	The Applicant has not answered the question asked, which specifically excludes ‘any other development which may be facilitated by the relocation’.	
2.19	<p>The response given here is still unclear as to whether all residential and commercial development anticipated in the adopted local plans, the Greater Cambridge LP First Proposals, including sites identified (in some cases with planning permission already granted) for development post 2041 (which includes for example the majority of NECAAP) have all been taken into account in the Phase 1 and Phase 2 designs applied for. As a separate point, the Development Strategy Update now anticipates a higher housing and employment need for the period 2020 to 2041, which may or may not be met by bringing forward in part some of the post 2041 housing sites in the GCLP FP. The Applicant needs to set out the basis of the sizing calculations that include for all of these needs. The requirement to meet up to date ‘objectively assessed housing needs’ is expressly referred to in the answer to 2.35.</p> <p>It would appear from the answer to 6.25, that no allowance has been made in the design to accommodate <b>known</b> housing sites that were in GCLP FP as likely come forward after 2041, even though these could well be earlier.</p> <p>It is ridiculous to describe the absence of any housing development on the core site or adjacent land at NECAAP as a ‘market failure’. On this basis, the absence of housing proposals on, say the Tesco superstore at Milton, would be described as a market failure.</p>	

2.27 f) and g)	The HIF bid contained two costed scenarios, based on different locations, a short tunnel and a long tunnel option. SHH has established that the PD is on a site which is close to if not exactly on a site which fits the short tunnel option. The lower cost attributed to the short tunnel option was £167 million.	
2.28	The point ignored in the Applicant's answer is that the development potential and value of sites was not a criterion used in earlier stages of site selection and should not have been applied to ensure the exclusion of Site 2 and to bolster the selection of Site3, that finally selected.	
5.6	SHH disagrees with the Applicant's assertion that there are no residual lighting effects which require further consideration. SHH refers the ExA to SHH Written Representation which relate to impacts on wildlife and other matters.	REP1-171 SHH WR Section 10.5.1 (b) & (d)
5.7	Recreational usage of Stow-cum-Quy Fen SSSI. SHH agrees with Quy Fen Trust and Natural England that increased footfall may have an impact. The Quy Fen Trust should be represented on any Advisory Group for the LERMP as set out in answer to 5.12.	SHH 19; SHH 27
5.18	Effect of operational lighting on bats. SHH welcomes the Applicant's proposal to submit a detailed lighting plan, but this should be pre DCO consent, not post. The Lighting Assessment Report (AW 5.4.15.3) states that the report is a desk-based study and there is a lack of detail on the number, height, spacing and luminance of lights.	REP1-171 SHH WR Section 10.5.1
5.22, 5.26 to 5.28	Biodiversity Net Gain – river units. The Applicant's commitment to bring forward further details of these at Deadline 2 is noted. The change to Requirement 10 is noted.	REP1-171 SHH WR Section 10.21
5.32	Can the Applicant please confirm the status of affected Parish Councils as intended consultees in relation to these approvals?	
5.44	Can the Applicant please confirm how a maximum removal of a 6m length of hedgerow for the Waterbeach pipeline can be squared with the need to move machinery and materials	

	along the line of working?	
Section 6	SHH has submitted substantive criticisms of the Applicant's carbon assessments in the WR and will respond to the points made in Section 6 once the Applicant has reviewed and responded to SHH. Demolition emissions have been assessed by SHH, but it is noted that the Applicant now intends such an assessment in answer to 6.35.	REP1-172 CUED Greenhouse Gas emission demolition
6.37	This response ignores the flawed assumption made by the Applicant that the houses built on the counter factual site will be 30% larger units than those at NECAAP.	
7.5	It is Junction 34 of the A14. This statement still makes little sense. On what basis are those same users of Horningsea Road to the north of J34 <b>not</b> sensitive?	
7.9	SHH questions that access to Poplar Hall and Poplar Hall Farm would not be affected and also believes that access to Biggin Abbey and Biggin Abbey residences will be.	
7.14	Temporary disruption to the River Cam navigation As well as the users listed in the Applicant's response, the river is increasingly used by paddle-boarders, included a paddle-boarding school. Students of the Duke of Edinburgh Award use the river for kayaking and paddle-boarding.	
7.24	It is clearly not acceptable for the permissive access to only be committed to for a period of 30 years.	
7.25 c)	This answer is illogical. The reality is that the applicant is creating c70 ha of open access woodland and grassland with paths close to the edge of Cambridge replacing an area of open arable land. It is clearly the case that this will be a popular destination for walking and other recreational pursuits and significant numbers of users will come by car. The Applicant appears not to be committing to making appropriate physical provision on its land in the even that, for example, nuisance parking or damage starts to occur.	
8.15 para 8	SHH refers the ExA to its comments on the Funding Statement	SHH 22

8.16	The obligation on the Applicant to treat waste water from Waterbeach does not flow from the s35 direction and it would have been entirely feasible to connect Waterbeach to the existing WRC via a route west of Milton and then to combine flows to a new works were one permitted. This would avoid the need for a section of Waterbeach pipeline from the new works to the existing which will become redundant very shortly after it is built, assuming the PD gets consent. It is difficult to see how the necessary powers to acquire land and construct this section of the pipeline can meet the s122 Planning Act tests.	
8.25 and 8.26	SHH refers the ExA to its comments on the Funding Statement and asks what measures will be taken if additional funding is not found? It is not clear from the answer to 8.26 if that additional funding will definitely be secured <b>during the Examination</b> leaving completion of the PD at risk from lack of funds, because of cost overruns and other events. Elsewhere it is stated that the partners are only committed to meeting 5% of any cost overrun above the HIF funding which is a fixed cash sum.	SHH 22
8.31	The Applicant's regard for timescales appears very flexible. Cumulative delays to milestones could result in substantial delay to the Councils' aspirations to achieve housing targets at NECAAP.	
9.1	SHH notes the Applicant's willingness to include more detailed design principles within the dDCO. The continued involvement of expert external advice in design is welcomed. SHH remains of the view that the advice and deliberations of that Panel should be publicly available and allow for attendance by appropriate Council officers and others. This is the case with, for example, the HS2 Independent Design Panel.  SHH has submitted a Design Critique and Written Representation on other aspects of design.	REP1-172 (SHH08) Section 3.1 g) & Fig 17; REP1-171 10.5.1
9.6	None of the 'hill forts' cited are substantial above ground structures in an open flat landscape. The Devil's Dyke, the most substantial of the linear earthworks, and others were essentially boundary earthworks between different communities.	
9.8	The ExA is asked to note that the further sinking of the larger structures such as the digesters is merely described as 'less plausible' not infeasible. A further modest reduction	

	in the works FFL by say 1 or 2 metres, and deeper for certain structures, is entirely feasible in engineering terms and references to the chalk aquifer are merely an excuse for not doing it.	
10.12	SHH believes this statement is incorrect in that the City Council is not a waste <b>planning</b> authority, and that the relevant planning authority should solely be the County Council.	
dDCO Articles and Schedules	SHH has made detailed requests for changes to these, including Schedule 1, 2 and 14, to which the Applicant has yet to respond. SHH believes that the specification of parameters in Schedule 14 is both confusing and incorrect in places and this may have affected the extent to which those parameters and powers to deviate have been assessed in the ES.	
11.1	Since the access road has to be constructed in large part on a high earth bank and all of these facilities are intended for use as part of the works and not for recreational purposes, these are 'inappropriate development'.	REP1-171 SHH WR Sections 6.2.1; 6.2.4
11.2	SHH cannot agree that the design 'optimises the area around it to integrate the development into the countryside'. SHH refers the ExA to the evidence on landscape impact and Green Belt by SHH and that by SCDC. SHH's assessment is that there will be 'very high harm' to Green Belt and greater long term visual impacts than those assessed by the Applicant.	REP1-171 SHH WR Section 8.2.8
11.7	SHH notes that the Applicant agrees that many of the operational benefits of the PD could be achieved by further improvement at the existing WWTP.	
11.9	SHH has submitted its own assessment of Green Belt impacts and believes that the Applicant misrepresents the approach adopted in the LUC assessment which was clearly directed to the assessment of the impacts of mainly residential development contiguous with existing built-up areas and villages and were not generally looking at large free-standing areas of any type of development.	
12.1	SHH notes that the Applicant agrees that the existing WWTP is suitable for the Existing needs and with modifications and investment will be able to meet foreseeable future	

	needs.	
12.5	SHH refers the ExA to SHH's Written Representation on Mental Wellbeing impact	REP1-171 SHH WR Section 10.3
12.11	The Applicant's Assessment of impact on Pupils and staff of Fen Ditton primary School is at variance with the information collected by SHH in its survey.	REP1-171 SHH WR Section 10.3
12.12	SHH refers the ExA to SHH's Written Representation on Mental Wellbeing impact	REP1-171 SHH WR Section 10.3
13.2 and 13.15	Both SCDC and SHH have given evidence that the harm on certain listed buildings is 'at the higher end of less than substantial' applying the professional guidance and case law.	
13.15	SHH believes there is under-reporting of the effects on the listed building included in this section. SHH refers the ExA to its Written Representation.	REP1-171 SHH WR Section 10.4.2
14.8	SHH's future capacity and footprint concerns are still not fully addressed by this response. See SHH Comments on 2.19 and 21.3	
20.1.and 20.2	Important that a finalised reliable TA is delivered as soon as possible by D3, to enable review by affected communities.	
20.4	The minutes of this meeting were not available at REP1-079 and SHH was unable to find the document in other submissions.	
20.19 c)	SHH has challenged this in relation to the transport of HDD rigs for tunneling under the Cam and railway at Waterbeach and potentially for other trenchless works along the pipeline routes.	
20.26	The current bus service with stops at Horningsea and Fen Ditton are not suitable for access to the site, nor at suitable times for construction and operation employees.	
20.34	The Applicant's response ' <i>Where the SRN is not available construction vehicles would then travel on local side roads to reach their destination</i> ' implies that any incidents on the A14	

	and/or A10 (which are currently frequent and problematical) would necessitate construction traffic using local roads.	
20.39	A banks person will be available for abnormal load construction traffic when crossing the level crossing at Sation Road, Waterbeach. Will a banks person be available for abnormal load construction traffic crossing Clayhithe Bridge, which is narrow, humped and has no cycle path, and at the access to Hartridge's Lane which has an acute angled access and egress?	
20.46	Trip generation calculations for hazardous waste SHH believes this is a significant error. In SHH's WR it asks the Applicant 'to confirm that the largest volume of excavated material considered for transport on local roads is the foreseen excavation and replacement of 1950m3 of excavated material from 2 landfills near Clayhithe. Would any special measures be needed to cope?'	REP1-171 SHH WR section 13.3.3.5
20.65	The Applicant has stated that there is an error on capacity at A10/Denny End junction and that there will not be over capacity by 2026. However, at answer to Q20.65d, the Applicant states that ' <i>Requirement 9 of the draft DCO (App Doc Ref 2.1) could agree that change if it was felt necessary to mitigate impacts to the junction if that was seen to be an appropriate measure.</i> ' The potential to re-route through Horningsea is of great concern.	
20.79	The OLTP is currently 'Outline' and SHH has concerns on its enforceability	REP1-171 SHH WR section 13.3.4
20.80	Monitoring and enforcing measures in the OLTP rely on ANPR and monitoring breaches and complaints so is not proactive and if fails, would rely on CCoC resources.	REP1-134 CoCC response to ExA's ExQ1
20.88	The Applicant encourages remote working and accessing the PD by active transport. However, 71 parking spaces are still provided for staff. The targets in the OWTP are based on those from approved travel plans from nearby developments and close-by Waterbeach. However, Waterbeach has a rail station and bus services so is not comparable.	

<p>20.89 c)</p>	<p>The Applicant accepts that there will be a 2:1 ratio of parking spaces to staff which appears excessive</p>	<p>REP1-078</p>
<p>21.3 Capacity</p>	<p>a) The answers given raise new issues since PE is legally defined and can only sensibly be measured in relation to the total capacity of all elements of a works                  What exactly does the Applicant mean by “<i>biological capacity</i>”? Table 4.28, Para 4.1 Relevant Representation Comment 4.1 in Table 4.28 separates this from “<i>hydraulic capacity</i>”. It would be helpful if the Applicant explains how or if these relate to limits itemised in a discharge permit.                  Was the value of 270,000 PE measured or calculated for the existing Cambridge WRC? If so, how?</p> <p>b) How does the increase in treatment capacity from 1200l/s to 1640 l/s given in answer to 21.22 reconcile with the “<i>equivalent capacity</i>” in 21.3?</p> <p>c) The date of future expansion given elsewhere in the Application is not “2024”. Is this an error in the response 21.3?</p> <p>d) Applicant should confirm the values of “<i>biological capacity</i>”, “<i>hydraulic capacity</i>” and treatment capacities of the Waterbeach WRC if these are known.</p> <p>e) SHH’s fundamental concern is with the likely need for major upgrading works very soon after the relocated works is brought into use. On the Applicant’s own admission, Phase 2 is only sufficient for growth in demand to 2041 and SHH has challenged that assertion. The emerging local plan already anticipates housing development beyond 2041 that totals in excess of 25,000 dwellings, albeit not all of these are within the works catchment. Re-presenting the Applicant’s figures, the existing works throughput is c 200,000 PE (and it is very doubtful if the whole works has 35% over capacity). The 100,000 increase to 300,000 in Phase 2 comprises 70,000 for growth and 30,000 for Waterbeach. The latest Development Strategy Update is anticipating up to 2700 dwellings per year in the local plan area 2020 to 2041 (c 5,700 persons/year). It also anticipates annual job growth of up to 3,200 jobs per year, the majority of which will be inside the works catchment and will</p>	

	<p>give rise to additional commercial and industrial load on the works. Both of these figures are around 16% higher than the First Proposals.</p> <p>The Applicant is asked again to provide a full breakdown of the growth and capacity assumptions used in the Phase 2 design and to provide a realistic estimate of future growth in load thereafter. Given that after Phase 2, less than 10% of land inside the bund will remain for expansion, the Applicant needs to justify any statement that the footprint could accommodate up to 600,000 PE. This analysis needs to consider all aspects of the treatment capacity, sludge treatment, the transfer tunnel and outfall capacities. While SHH note that treatment technologies are improving, volumes of water to be treated from domestic and industrial users per capita are only reducing very slowly.</p> <p>If the Phase 2 DWF to be consented is c57,000 m3 per day, an increase to 600,000 PE is likely to increase that to c 85,000 m3 per day or more.</p> <p>SHH remains of the view that it is extraordinary for a major piece of public infrastructure to be applied for and consented through DCO that only has a stated capacity to handle demand for 7 years after completion with a further Phase 2 to give it 6 more years of capacity, all exhausted by 2041. This is the antithesis of sensible planning for Cambridge in particular where large scale growth driven by economic factors is being proposed.</p>	<p>REP1-078</p>
<p>21.4 Response to CCoC RR</p>	<p>a) SHH has raised the point that the drainage flows from inside the bund into the Black Ditch could lead to contamination of Quy Fen SSSI if such flows were contaminated. Figure 8.3: Strategic Drainage Plan for the Proposed WWTP Area in the Drainage Strategy (APP-162) shows the proposed connection between the internal drainage of the bund and the Black Ditch.</p> <p>b) In item 4.20-22 of the NPSWW compliance table (AS-130), the Applicant includes the point “... systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.”</p> <p>The Applicant’s design for the area within the bund has separate systems for areas identified as likely to be or potentially be contaminated and areas without such potential. The design should be altered to either return all of the drainage from within the bund into the works (see SHH 10.8.25 REP1-171) or include a facility to capture the outflow if it</p>	<p>APP-162</p> <p>AS-130</p> <p>SHH REP1-171 AW REP1-082, Item 1.2 AW Rep1-071</p>

	becomes contaminated. The Applicant should not be allowed to adopt a reactive approach and retrofit such a facility once contamination has occurred. SHH notes that, although a simple solution may be feasible, the comment on this element of the Drainage Strategy applies across several documents.	
21.5 WINEP guidance	SHH suggests the question should extend to cover AMP8 and beyond given the Applicant's "...aim to meet the ambitions and objectives of the WINEP programme". SHH WR paras 10.8.12 to 10.8.22 support an overarching concern that the space provision within the bund or choice/design of treatment technology should be adequate for the long term and have sufficient flexibility to meet, for example, much more stringent discharge conditions in terms of pollutant concentrations.	SHH REP1-171
21.18 Monitoring	SHH queries if the "...monitoring of pressurised pipelines..." to address the EA's "...concerns regarding potential leakages..." will include both periodic walkover surveys and repeat leakage tests on the Waterbeach pipelines. SHH's other comments on the draft Outline Water Quality Monitoring Plan are given in 21.26 below.	AW REP1-046
21.20 Capacity	SHH's concerns on capacity and headroom are covered in 21.1 above.	
21.22 Storm Water	<p>Please refer to 21.3 above.</p> <p>Noting "...the increase in treatment capacity (1,200l/s to 1,840l/s) and the addition of the 2.3km transfer tunnel..." SHH suggests the reference to "increased storm storage" in the response to question 19.23 requires clarification since the application shows the attenuation storage in the tunnel upstream of the TPS is included in the gross storage to be provided. SHH suggests that attenuation from upstream storage is less of a benefit in carbon terms than using existing storm tanks.</p> <p>The Applicant includes a comment on the benefit of attenuation storage in para 4.2, Table 28, response to SHH RR. SHH para 12.2.2 includes a comment on the assessment of this planning benefit.</p>	SHH RR-035 SHH REP1-171
21.23	SHH suggest a full evaluation of the option to stay on site is needed and would include consideration of the carbon footprint.	

<p>21.24 Abnormal Operating Conditions</p> <p>....By nature of the description, abnormal operating conditions are those that cannot be predicted or quantified. As such it is impossible to provide likelihoods....</p>	<p>SHH suggests the answer given is surprising given one approach to quantification could be to examine the Applicant's overall records of prosecutions for causing pollution and complaints about odour, sewerage pipeline leaks etc.</p> <p>SHH queried in RR-035 section 10.8 (ii) one particular, abnormal condition whereby outflows from the proposed WRC were, when compromised by high tailwater levels in the River Cam, less than the sum of the inflows due to the capacity of the lift pumps and the unquantified flows from the Waterbeach PS. The Applicant's response includes a description of the design of Waterbeach PS but gives no reassurance that the proposed Cambridge WRC could not be flooded by excess inflows. If flooding excess inflows could physically occur, SHH suggests a contingency plan should be put in place. See 21.46 below.</p>	<p>SHH RR-035</p> <p>REP1-178</p>
<p>21.26 Monitoring</p>	<p>SHH has the following comments on the draft Outline Water Quality Management Plan:</p> <ul style="list-style-type: none"> <li>a) Operational monitoring of the outflow into the Black Ditch should not be limited to 5 years.</li> <li>b) Volumes of outflow to the Black Ditch should be continuously measured. If a weir or notch is used, then water levels across the weir should be measured both upstream and downstream to allow for measurement when the structure is partially drowned.</li> <li>c) If results and reports are sent principally to the EA and Natural England (Table 5.1 refers), SHH suggest any concerns raised by these recipients should be shared with the relevant Parish Councils and, where relevant, the Quy Fen Trust.</li> </ul> <p>Refer also to 21.4 above with reference to potential pollution of the Black Ditch and to 21.18 above.</p>	<p>REP1-046</p>
<p>21.33 Benefits</p> <p>a) .....Currently, effluent from Waterbeach WRC</p>	<p>a) SHH has reported (paras 10.8.15 of REP1-171) how the ES (paragraph 4.4.26 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20, AS-040) overstates the benefits to the River Cam and omits the adverse impacts on the reaches between the existing Cambridge</p>	<p>SHH REP1-171</p> <p>AS-040</p>

<p>discharges to Bannold Drove Drain.</p> <p>b) ...The comparison is with the existing WWTP functioning at the DWF limit.</p>	<p>WRC outfall and the IDB pumping station in the interim case. This has still not been addressed by the Applicant or the EA.</p> <p>b) SHH understands that the current discharge permit limit for DWF and other parameters was set when the load at the WRC was less than 200,000 PE. The answer given in 20.3 above uses a different measure of capacity than DWF.</p> <p>Furthermore, the Environment Agency has confirmed that the current permitted DWF is being exceeded and that a revised permit is under consideration. Adding Waterbeach influent to Cambridge WRC would exacerbate exceedance of the current DWF limit.</p> <p>SHH believes it is essential that the discharge permits are substantially determined in time for their provisions to be explored by the ExA, prior to the close of the Examination.</p>	
<p>21.35 Assessment</p> <p>no CSO retained at the Existing WWTP and no new CSO included.</p>	<p>SHH notes that the engineering design is such that influent containing a mixture of sewage and stormwater will be lifted at the TPS and, once the storm storage is full, separate pipelines will convey flows of different levels of treatment to the outfall where the flows will combine with river water. Beyond the mixing zone, the design will mirror the function of the existing CSO.</p>	
<p>21.37 Monitoring ....Requirement 22(4)</p>	<p>Please refer 21.26 above</p> <p>Refer also to 21.4 above with reference to potential pollution of the Black Ditch.</p>	
<p>21.39 Assessment</p> <p>As noted in 21.2 above, the Flood Risk Assessment (App Doc Ref 5.4.20.1) [APP-151] will be updated following revised hydraulic modelling and further</p>	<p>SHH will comment once the revised FRA report is available. Refer also to 21.51 below.</p>	<p>APP-151</p>

<p>engagement with The Environment Agency for Deadline 3.</p>		
<p>21.56 and 21.61</p>	<p>These answers do not address the requirement for the ES to set out an assessment on a ‘reasonable worst case basis’.</p>	

<p><b>21.44 Surface water drainage strategy</b></p>	<p>Refer to 21.4 above</p>	
<p><b>21.46 Flood risk</b> The Environmental Permit will include conditions requiring management systems to cover operational monitoring, emergency responses and pollution prevention</p>	<p>SHH suggests determination of the Environmental Permit is based on an objective of management systems in emergencies to be avoiding contamination of the Black Ditch in preference to contamination of the River Cam from use of the Riverside CSO and contamination caused by reduced pumping from Waterbeach. This would avoid the transfer of risk from existing receptors to the Black Ditch, a new receptor.</p>	
<p><b>21.49 Flood Risk</b></p>	<p>SHH comments on Site Selection are included in Section 5, Written Representation.  SHH understands that flood risk was a potential factor in rejection of a site put forward for a separate Waterbeach WWTW. The Environment Agency and Cambridge County Council have further details.</p>	<p>REP1-171</p>
<p><b>21.51 NPSWW</b> The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 4.4.17...</p>	<p>In contrast to the Applicant’s response referencing para 4.4.17 of NPSWW c), SHH suggests that the proposed pumping of sewage and storm flows upstream to an outfall near the A14 must increase total flow below that point and thus flood risk in reaches between the proposed outfall and the IDB pump station near Streatham. Pumping may also increase flood risk upstream of the proposed outfall if backwater effects occur. SHH will comment once the revised FRA report is available.</p>	
<p><b>21.52 Surface Water</b> ....volumes and peak flow rates of surface</p>	<p>Risks outside the design case are commented on in 21.4 and 21.46.</p>	

<p>water leaving the site.....</p>		
<p><b>21.56 and 21.61 Climate Change and Future Low Flows</b>                   .....As a result, it is not possible to predict with a reasonable degree of accuracy the impact of climate change on downstream river water quality. Please refer to 21.61 below for additional discussion regarding the impacts of climate change on low flows and river water quality.</p>	<p>SHH suggests the concern is that Climate Change should not be ignored. Having posited that a 20% reduction in low flows is plausible, the Applicant should report whether the space within the bund is adequate, and the process design could be modified to achieve comparable water quality outcomes in the River Cam.</p>	