

CWWTPR DCO Examination**Submission by Save Honey Hill Group 6 December 2023****SHH Comments on Environment Agency Response to ExA Questions (REP1-152)**

Save Honey Hill Group's comments follow the structure of the EA responses to ExA questions.

REP1-152 Paragraph References	SHH Comment	References to SHH or Other Submissions
<p>2.20 - Need and WINEP, ...relocating the existing site gives an opportunity to have a bigger, upgraded works ...</p> <p>The new site will be subject to obligations made under the WINEP.</p>	<p>SHH notes the Environment Agency's response points to its understanding of opportunities for both expansion and betterment.</p> <p>SHH believes that any necessary expansion and betterment could take place on the existing site and result in a significant reduction in capital carbon. Please refer to paras 4.7.1 and 5.2.7 in SHH Written Representation.</p> <p>The Applicant has yet to demonstrate satisfactorily that the PD is sized to meet the reasonable expectations for additional treatment to meet anticipated development requirements covering the design life of the new works. This concern is exacerbated by the Applicant's choice of an inflexible tightly defined circular footprint for the PD.</p>	REP1-171
<p>5.34 - Otter Habitat It is recommended that an Ecological Clerk of Works is present during any works which will impact these watercourses...</p>	<p>SHH agrees with the suggestion that an Ecological Clerk of Works (ECW) is present. SHH suggests an ECW is also present during works including those which could impact the CWS on the disused railway and the habitat of rare and endangered <i>hymenoptera</i> in the area of Low Fen Drove and remainder of the disused railway. The need to preserve this habitat is included in para 10.2.5 of SHH Written Representation.</p>	REP1-171

<p>5.47 - Control of effluent load and water quality as a minimum requirement, will not deteriorate from the current or planned quality.</p> <p>“... in line with the legislative requirements to reduce storm spillages so that they do not discharge above an average of 10 rainfall events per year by 2050”</p>	<p>SHH suggests that the Environment Agency be asked to clarify:</p> <ul style="list-style-type: none"> a) if the “minimum” refers to the current quality at the consented DWF. Please refer to SHH’s comments on the Applicant’s response to ExQ1 question 21.33. b) If planned quality refers to the AMP 7 or AMP 8 or future cycle since the Applicant response to ExQ1 question 21.5 refers only to the current AMP. <p>SHH suggests that the Environment Agency be asked to clarify that this reference includes the Riverside CSO and is not restricted to discharges at the proposed outfall for the relocated works.</p>	<p>REP1-079</p>
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<p>15.2 - Consents, permits and licences ...no reason to believe that any operational pollution control permits, flood risk activity permit, licences, or other relevant consents would not subsequently be approved...</p>	<p>SHH has raised extensive concerns including the adequacy of the design and footprint of works needed to ensure that the development can secure these essential consents. Refer to para 2.20 above.</p>	
<p>15.3 - NPSWW We consider that subject to assessment there are no relevant issues that cannot be adequately regulated through the permitting process.</p>	<p>SHH has suggested the proposed design should be modified to avoid the risk of contamination of the Black Ditch and Quy Fen SSSI. Please refer to SHH’s comments on the Applicant’s response to ExQ1 questions 21.4, 21.37 and 21.46.</p>	<p>See SHH 28</p>

<p>15.5 - Monitoring We do not regard such monitoring as essential. The applicant has advised that no demolition or below ground works are required during decommissioning.....</p>	<p>This is a response predicated on the Applicant’s assertion that it has no responsibility or liability for demolition or remediation of the existing works site. As the occupier, the Applicant has such obligations, even if others carry out those activities.</p>	
<p>21.30 - Permitting and benefits We are unable to discuss information that has been submitted to us through the permit applications until they have been Duly Made.</p>	<p>SHH believes that the ExA and all other parties need to be able to properly scrutinise those permits well before the conclusion of the Examination to be satisfied that the DCO design and land take are sound and capable of meeting changing discharge standards, mitigation and other contingent requirements during the operational life of the works. Please also refer to 15.2 and 2.20 above.</p>	
<p>21.5 - WINEP guidance This is unknown. However, we believe that the proposed site has been constructed to accommodate a future phosphate limit tighter than the current Technically</p>	<p>SHH is concerned about the site footprint and whether higher phosphate and other discharge standards are achievable with the choices of treatment technology which are intended in the Proposed Development. The Applicant must be asked to confirm and evidence that the Environment Agency’s belief is correct. Please also refer to 2.20 above.</p>	

Achievable Limit (TAL) of 0.25mg/l, should this be required in future ...		
21.8 - Mitigation In our opinion the proposed mitigation, which includes a programme of water quality monitoring and measures to limit potential water pollution to the Black Ditch and Quy Fen is acceptable.	SHH and Natural England have suggested additional measures are possible and needed to avoid pollution of the Black Ditch and Quy Fen. Please refer to 15.3 above.	
21.9 – Assessment Yes. The assessment has been carried out based on the Dry Weather Flow (DWF) envisaged from the proposed development, which includes the effluent from Waterbeach	SHH asks the Environment Agency to confirm if it agrees with SHH’s conclusion that the Applicant’s assessment has not included adverse impacts on the River Cam between the A14 and the IDB pump station near Stretham for the Interim Permit.	See SHH WR (REP1-171) at para 10.8.15
21.42 - Water Framework Directive ... based on models designed to	Please refer to SHH comments on 5.47 and 21.5 above.	

<p>inform PR19 (AMP7) decisions..... ...will ensure there is no deterioration from the current or planned quality.</p>	<p>The Environment Agency should be asked to confirm that it is satisfied that all possible treatment needs have been assessed, taking account of reduced river flow at the outfall due to climate change and upstream abstraction.</p>	
<p>21.47 - Flood risk</p>	<p>SHH will comment on the revised hydraulic model. SHH has raised concern that the transfer of discharges from Waterbeach will raise flood levels. Please refer to SHH comments on Applicant's Responses to ExQ1 question 21.51.</p>	<p>SHH 28</p>