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**Our ref:** AC/2023/131915/01-L01  
**Your ref:** WW010003

**Date:** 05 January 2024

**FAO: Kathryn Taylor**

Dear Sir/Madam

## **CAMBRIDGE WASTE WATER TREATMENT PLANT RELOCATION FLOOD RISK ASSESSMENT**

We have reviewed the revised Flood Risk Assessment (FRA), Application Document Ref. 5.4.20.1 Rev 03, dated December 2023 that was received on the 19 December 2023.

We consider this revised FRA to be **unacceptable** for the following reasons:

**The FRA fails to demonstrate that there will be no increase in flood risk to properties and third party land due to the proposed development. As such, the FRA is contrary to paragraph 170 of the NPPF.**

**Although the FRA refers to potential mitigation measures, no details of proposed mitigation measures are included in the FRA. No evidence has been provided to demonstrate that these measures would ensure there is no increase in flood risk to any properties.**

Chapter 4 of the FRA presents the results of fluvial modelling that has been undertaken to assess the impact of the proposed new outfall on flood risk. The results of the modelling indicate that there would be an increase in flood extents and depths in several locations downstream of the new outfall. This includes areas of land where properties are located to the east of Waterbeach.

### **Concerns with the draft Cambridge WWTP River Modelling Report**

We also received a draft Cambridge WWTP River Modelling report (ref. 123239, dated December 2023) on the 18<sup>th</sup> of December 2023 and have undertaken an initial basic review of this report, which supports the FRA.

We acknowledge the statement in the Conclusions section of the report that the predicted changes in flood risk may be due to the modelling approach and assumptions rather than genuine impacts from the proposed Waste Water Treatment Plant (WWTP) or outfall. In particular, the model report states that the post-development scenario includes runoff from planned future growth in the catchment whereas the existing baseline scenario does not. The report also states:

*'While the modelling results show increased flow and volume through the new outfall, this is primarily due to the inclusion of future growth within the catchment in the new outfall scenario'.*

As such, the baseline and post-development model results are not directly comparable. The report also indicates that there will no longer be discharges from the Waterbeach outfall once the new WWTP is in place, but the existing discharges are not represented in the model. As such, the model results are likely to underestimate flood extents and depths in the baseline scenario in the downstream part of the model.

**Please note that our Evidence and Risk team has not yet completed their review of the modelling that has been undertaken to support the FRA.** We are therefore unable to confirm whether this modelling is acceptable for the purpose of the FRA.

### **Way Forward**

The FRA needs to address the issues detailed above and demonstrate that the development will not increase flood risk elsewhere and, where possible, will reduce flood risk overall, in line with paragraph 170 of the NPPF.

We consider that either another baseline scenario should be run with predicted future growth included or another post-development scenario should be run without planned future growth included. This would allow the baseline and post-development results to be directly compared and would allow the impact of the new WWTP and outfall on local flood risk to be determined. If possible, existing discharges from the Waterbeach outfall should be included in the baseline scenario.

**Unless sufficient evidence can be provided to demonstrate that the new outfall will not increase flood risk off-site, including flood extents and/or flood levels within third party land, mitigation must be provided to ensure there is no increase in flood risk elsewhere.**

As detailed in our Relevant Representations, the FRA needs to clearly demonstrate how any increase in flood depths will be mitigated to ensure there is no increase in flood risk to any properties. There should be no new areas of land introduced to flood risk post development. If any increase in flood risk to third party land cannot be fully mitigated, the relevant landowners will need to be informed of the predicted increase in flood risk to their land; evidence that the landowners accept this increase in flood risk will need to be provided.

Drawings that clearly show the impact and locations of any areas of land where an increase in flood depths and/or extents is predicted must be included in an updated FRA. Drawings and plans of any mitigation measures must also be included in an updated FRA.

We would be happy to attend a meeting to discuss the issues detailed above.

Should you wish to discuss this matter further please do not hesitate to contact me.

Yours faithfully

**Neville Benn**  
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