

## **Cambridge Waste Water Treatment Plant Relocation – DCO examination**

### **Submission made by Quy Fen Trust**

### **Summary of Oral Submissions - Issue Specific Hearing 3 (ISH3) – Day 2 - 11<sup>th</sup> January 2024**

**19 January 2024**

#### **1.0 Introduction**

This representation provides a summary of the oral submissions made by Matthew Asplin on behalf of Quy Fen Trustees (QFT) addressing the specific Agenda Items:

Agenda Item 5: Ecology

Landscape, Ecological and Recreational Management Plan (LERMP), including:

- Recreational impacts on Stow-cum-Quy Fen Site of Special Scientific Interest.
- Funding towards organisation of an Advisory Group.

Agenda Item 6: Water Resources, including:

- Hydrological contamination.
- Surface water drainage.
- Outline water quality management plan.

#### **2.0 Agenda Item 5: Ecology**

2.1 The Applicant confirmed that it will be extending an invite to Quy Fen Trust for the Advisory Group planned to include Natural England, The Wildlife Trust, National Trust and Cambridgeshire County Council, which is welcomed.

2.2 The Natural England and Cambridgeshire County Council submissions, regarding the need for a baseline study / survey to allow potential visitor pressure to be gauged and managed, are supported by QFT.

2.3 QFT notes that it is the Applicants intention to open up a section of the old railway line which via the additional connectivity to Low Fen drove will allow routes from High Ditch Road to Station Road in Stow Cum Quy and in turn increased connectivity to Quy Fen SSSI. QFT therefore considers the potential for impacts resulting from visitor pressure to be greater than might be experienced from purely circular paths around the Proposed Development (PD). Further, QFT does not agree with the Applicants view that the development is only likely to have a de minimis impact on visitor pressure.

2.4 It is unclear how the potential visitor pressure and de minimis impacts suggested by the Applicant can be gauged without the presence of a baseline study / survey requested by Natural England and Cambridgeshire County Council.

2.5 QFT highlighted the mismatch in the position taken by the Applicant, between promotion of the additional benefits the Applicant is stating will arise from the additional paths / bridleway and its suggestion that these introductions will only give rise to a de minimis impact.

2.6 QFT Written submission REP1-166 reinforces the need for measures established to address potential impacts of visitor pressure to be underpinned with a formal corresponding funding plan. QFT therefore welcomes the news that funding will be made available through a formal mechanism, such as a section 106 agreement, which is clearly preferable to a corporate arrangement.

### **3.0 Agenda Item 6: Water Resources**

3.1 QFT remains concerned regarding the Applicants plans for surface water drainage and the corresponding monitoring regime.

3.2 It is noted in the Drainage Strategy Appendix 20.12 [APP162] that 36% of surface water drainage within the PD which is potentially contaminated is returned to the head of the process, with the remaining 64% being discharged via an attenuation pond to the adjacent ditch.

3.3 The attenuation pond output discharges into Black Ditch and ultimately has a hydrological connection with Quy Fen SSSI.

3.4 The Outline Water Quality Monitoring Plan Appendix 20.13 [REP2-028] sets out the water quality testing requirements, including the criteria for the attenuation pond which during the operational phase of the PD is only scheduled to be tested annually.

3.5 Many years ago (circa 30) Quy Fen SSSI experienced some impacts suspected to be as a result of nitrate leaching and following transmission through the ditch network and surface water flooding reached the fen with a resulting impact on some species within the SSSI. Therefore any identification of potential pollution in the attenuation pond during annual testing is likely to be too late.

3.6 While a considerable proportion of the water draining into the attenuation pond will be from SUDs system areas that represent a low risk, other volumes drain from the wider site not considered to be classified within the 34% returned to the head of the waste treatment process.

3.7 Preliminary Odour Management Plan ES Chapter 18, Appendix18.4 [AS106] sets out a range of measures to address spills across the PD including roads and highways, including non-normal and emergency conditions, which presumably when combined with weather events have the potential for transmission.

3.8 QFT would be reassured if measures were provided at the attenuation pond or within the PD to ensure beyond any doubt, that any risk of contamination to be drained to Black Ditch is removed entirely and a corresponding testing regime implemented to ensure this is proven before testing timescales are reduced.