

Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Appendix 10.2: Outline Carbon Management Plan

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1 Introduction

1.1 Background

- 1.1.1 This document is an outline of a future Operational Carbon Management Plan for the proposed Cambridge Water Treatment Plant Relocation Project (“the Project”). The Environmental Impact Assessment (EIA) process for the Project has identified that there is, under certain design scenarios, the potential for the Project to give rise to net positive operational carbon emissions, contrary to the water industry’s aspiration to be operationally net zero by 2030. In order to ensure that the project remains operationally net zero, the draft Development Consent Order (DCO) for the Project imposes at Requirement 21 an obligation to agree an Operational Carbon Management Plan showing how operational net zero will be achieved. The Plan must be agreed with the local planning authority before the most carbon intensive element of the project’s operation (the gas recovery plant) comes into operation. It is not possible at the current stage in the project’s design process to fully assess its operational carbon performance. Most notably, and as described in the carbon chapter of the Environmental Statement, a decision on whether to adopt “gas to grid” technology will heavily influence the operational carbon performance of the plant. This outline plan sets out how the future operational carbon management plan secured under Requirement 21 of the DCO will be developed and the issues which it will take into account to ensure that the Project will be operationally net zero. Plan aims and objectives
- 1.1.2 This outline Operational Carbon Management Plan (OCMP) provides an outline of how the Applicant intends to achieve operational net zero emissions over the lifetime of the Proposed Development. It provides principles that will be used to support final decisions, that will be used to add detail to the plan over time.
- 1.1.3 This is a live plan that will be updated to a more detailed OCMP over time, covering updates on decisions that will impact operational emissions of the scheme.
- 1.1.4 A key driver for this plan is the ongoing development optionality for the Proposed Development in relation to the end-use of energy recovered in the form of biogas at the site, which has significant impacts on the operational carbon balance of the Proposed Development. This outline plan highlights considerations that are ongoing to ensure the Proposed Development continues to be able to meet its commitments to be operationally net zero in line with the Applicant’s 2019 commitment regardless of which option is chosen.

2 Best Practice Guidance and Terminology

2.1 Carbon net zero vs Carbon neutral

- 2.1.1 Carbon net zero is the reduction of anthropogenic greenhouse gas (GHG) emissions to zero or a residual level that is consistent with reaching net zero emissions in eligible 1.5°C pathways (hence time-bound) and neutralising the impact of residual emissions (if any) by removing an equivalent volume of carbon (PAS2080:2023, 3.35).
- 2.1.2 Carbon neutrality means that during a specified period there has been no net increase in the global emission of greenhouse gases to the atmosphere as a result of the greenhouse gas emissions associated with the subject during the same period (BSi, 2016).
- 2.1.3 Carbon net zero differs from carbon neutrality, as net zero is focused on reducing whole life emissions and using removals to balance out residual emissions within a certain timeframe, whereas carbon neutrality relies on carbon offsets and does not necessarily support whole life carbon reduction (PAS2080:2023, 3.35 Note 2).
- 2.1.4 Carbon offset refers to a discrete reduction in greenhouse gas emissions not arising from the defined subject, made available in the form of a carbon credit, used to counteract emissions from the defined subject (BSi, 2016).
- 2.1.5 According to the Science Based Targets Initiative (SBTi) an organisation may claim the label “net zero” through pursuing a 90% reduction in carbon emissions and offsetting the remaining 10% (or less) through carbon removals (SBTi, 2023).

2.2 Net Zero operational emissions coverage and definitions

- 2.2.1 The net zero operational emissions commitment was made by the Applicant in 2019 within the Water UK routemap (Water UK, 2019) before much of the above definitions were established. It commits the applicant to reduce its operational emissions, covering Scope 1 and 2 emissions, as well as any Scope 3 emissions associated with outsourcing any operational activities related to the proposed development. These scope boundaries are defined below in accordance to the Greenhouse Gas Protocol (GHG Protocol, 2004).

~~2.2.2~~ 2.2.2 Scope 1 –Direct emissions from owned or controlled sources.

~~2.2.3~~ 2.2.3 Scope 2 - Indirect emissions from the generation of purchased energy

~~2.2.4~~ 2.2.4 Scope 3 - all indirect emissions (not included in scope 2) that occur in the value chain of the reporting company, including both upstream and downstream emissions

- ~~2.2.5~~ 2.2.2 The commitment allows for the use of carbon offsets to achieve net zero operational emissions. A detailed description of the coverage of the commitment is provided in Section 2 of the Net Zero 2030 Routemap (Water UK, 2019).

2.3 Offset definitions

- 2.3.1 Offsetting interventions – the measures taken to “offset” any residual emissions from a project. In the event that such measures provide reductions/removals at least as high as the residual emissions, a state of carbon neutrality is achieved in that the net increase in emissions is zero.
- 2.3.2 Removals – refers to the capture of greenhouse gases out of the atmosphere and storage in a stable format such that there is low risk of the gases being reemitted. Carbon removal can be achieved through the creation of new habitats (such as woodlands) or through the restoration of degraded habitats (such as peatlands). Both habitat types sequester carbon dioxide out of the atmosphere and store it for a long time in the habitat, e.g. trees or soils.
- 2.3.3 Avoidance – a type of offset that contribute to emission reductions when compared against the most likely alternative outcome, e.g. prevention of the degradation of a habitat or supporting the insulation of homes where otherwise they would not have been.
- 2.3.4 Additionality – A criterion for assessing whether a project has resulted in GHG emission reductions or removals in addition to what would have occurred in its absence. This is an important criterion when the goal of the project is to offset emissions elsewhere.
- 2.3.5 Permanence – demonstrating interventions will remain for a given period to allow benefits claimed to be realised – offset benefits can only be claimed once removals or avoidance benefits have occurred.

3 Operational Carbon Baselines for Proposed Development

3.1 Introduction

3.1.1 This section sets out the operational carbon profiles under the two options for the Proposed Development. This highlights the variation in operational emissions and the scale of residual emissions that may need to be managed to continue to meet the operational net zero emissions commitment. This aligns to the operational carbon assessment provided in ES Chapter 10, Section 4.4

3.2 Carbon assessment

3.2.1 ~~Figure 3.1~~ **Figure 3.1** shows the net cumulative emissions of the Proposed Development for the 2 biogas utilisation options being considered:

- DCO design – preferred option, represents one of the two options at the current stage of design, namely the gas to grid (G2G) option.
- DCO design – Combined Heat & Power (CHP), represents the other of the two energy recovery options at the current stage of design.

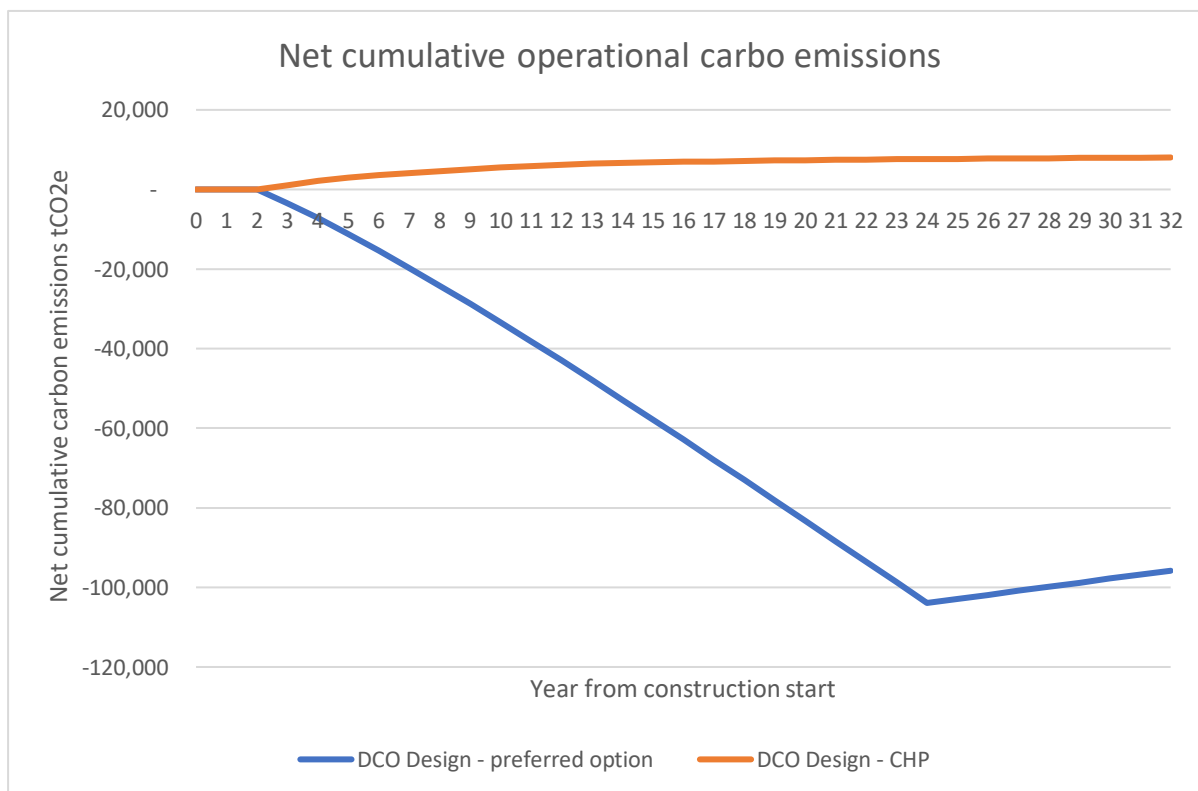


Figure 3.1 – Summary of whole life operational carbon emissions scenarios – excluding process emissions

- 3.2.2 The preferred option with G2G for the proposed development is estimated to be operationally carbon positive in its first year of operation. This is largely due to significant avoided emissions, as the biomethane produced and injected into the grid would avoid emissions from gas produced from fossil fuels, therefore supporting wider national decarbonisation objectives.
- 3.2.3 The CHP option, however, incurs residual emissions across its operational life with ~1,000tCO₂e in its first year of operation and steadily rising to over 8,000tCO₂e of residual emissions across its 30 year operational life.
- 3.2.4 The assessment presented in ~~Figure 3.1~~ ~~Figure 3.1~~ currently excludes process emissions, the Applicants approach to managing these emissions is provided in Section 3.3.8 and 3.3.9.

3.3 Residual emissions

DCO – Preferred Option Gas to Grid (G2G)

- 3.3.1 ~~Table 3.1~~ ~~Table 3.1~~ summarises the key residual emissions associated with the operation of the Proposed Development for the G2G option. This highlights that under the DCO preferred option, operational emissions are positive (excluding process emissions, which are not included in ~~Table 3.1~~ ~~Table 3.1~~ and are covered separately).
- 3.3.2 Under this option the scheme is considered operationally net zero and would not require additional offsets.

Table 3.1. Summary of residual operational emissions for DCO – Preferred Option G2G

Category	2028 (tCO ₂ e)	2050 (tCO ₂ e)	Cumulative Over 30 year operation (tCO ₂ e)
Power	1,740	180	14,500
Chemicals	50	50	1,600
Propane	860	860	25,890
Transport	70	70	2,030
Total Gross Annual Emissions	2,730	1,160	44,020
Export of biomethane	- 6,210	- 6,210	-136,710
Removals	- 30	- 140	-3,080
Total Net Annual Emissions	- 3,520	- 5,190	-95,780

- 3.3.3 In the first year of operation, power from the electricity grid accounts for 64% of the gross annual emissions. In 2050, the electricity grid is estimated to be close to being fully decarbonised (according to UK Government projections). Power from the

electricity grid in 2050 only accounts for 16% of the gross annual emissions. The 860tCO₂e associated with propane has remained unchanged since the first year of operation, and now accounts for 74% of the gross annual emissions. The assessment has taken a conservative approach by accounting for the total carbon impact of the imported propane, despite the reality that the net carbon impact will only to be approximately 15% greater than the natural gas which would be displaced within the gas network.

- 3.3.4 A significant assumption is the assessment assumes that the carbon benefit to displacing fossil-fuel derived natural gas from the national gas network over the assessment period remains the same each year up to 2050 (at which point the UK is expected to reach net-zero). Over time, to support decarbonisation to net zero, the gas network is likely to be blended with a greater proportion of biogas or other low-carbon gas sources and reduce the carbon benefit of the exports from the Proposed Development. The detailed OCMP will report operational emissions accounting for the change in the carbon value of exported biomethane and account for any changes in scale of offsets if required.

DCO Design Alternative CHP option

- 3.3.5 [Table 3.2](#) summarises the key residual emissions associated with the operation of the Proposed Development for the CHP option. This shows the need for a 1,080tCO₂e of additional offsets to have been secured by the time the proposed WWTP is commissioned for the Proposed Development to be operationally net zero in alignment to the applicants 2019 commitment. It also highlights the need for ongoing offsets, if no further mitigation measures are identified, to the scale of 8,040tCO₂e across the 30 year operational life of the Proposed Development.

Table 3.2 Summary of residual operational emissions for DCO Design Alternative CHP

Category	2028 (tCO ₂ e)	2050 (tCO ₂ e)	Cumulative over 30 year operation (tCO ₂ e)
Power	2,050	210	17,010
Chemicals	20	20	630
Transport	70	70	2,030
Total Gross Annual Emissions	2,130	290	19,670
CHP Generation	- 1,030	- 100	-8,560
Removals	- 30	- 140	-3,080
Total Net Annual Emissions	1,080	50	8,040

- 3.3.6 In the first year of operation, power from the electricity grid accounts for 96% of the gross annual emissions. In 2050, this reduces to 72%, reflecting the overall decarbonisation of the grid and how this reduces the total gross annual emissions by 86%.

- 3.3.7 Significant residual emissions that would need to be offset in alignment with the operational net zero commitment would be the residual electricity emissions and transport emissions. The Applicant is already reviewing additional opportunities for renewable generation, energy efficiency and low or zero carbon transport options, as summarised in Section 3.4.

Process emissions

- 3.3.8 Direct process emissions are a source of methane and nitrous oxide emissions arising from the treatment of wastewater and sewage sludge that contribute to global warming. These emissions arise at all sewage works, however there is a global industry wide challenge to better measure, monitor and manage these emissions effectively. The applicant, along with water sector regulators DEFRA and Ofwat, is investing to improve its measurement and monitoring of these emissions across its asset base. This monitoring will help establish an improved best practice measurement approach to inform strategies to manage these emissions.
- 3.3.9 The Applicant will provide an update on the progress on monitoring, measurement, and management of process emissions in relation to the proposed development via the detailed OCMP, once a decision with the sector regulators have agreed on a best practice improved measurement and monitoring approach, including how the client proposes to manage these emissions most effectively.

3.4 Control measures

- 3.4.1 The Applicant will continue to explore opportunities to reduce emissions as it progresses to later design stages and delivery, it will monitor these as part of the design and delivery process. The Applicant has a well-established carbon management process independently verified to PAS2080:2016, which is best practice within the infrastructure sector. Through this process decisions will be made through Risk, Opportunity and Value (ROV) sessions, with the decisions tracked and reported during detailed design. This ongoing decision-making and design optimisation is typical through to detailed design and allows the Applicant to make best value decisions to reduce carbon as technology viability, from a commercial and technical performance perspective, is continually changing.
- 3.4.2 The following sections identify a range of control measures that have been identified and will continue to be reviewed as part of the Proposed Development's continued progress to detailed design. The Applicant will provide a final update of expected operational emissions, following review of these potential control measures, in its detailed OCMP before the start of operation of the Proposed Development. The Applicant will also monitor and report annual operational emissions in line with its regulatory reporting requirements, as detailed in Section 5.1.

Design (energy recovery measures)

- 3.4.3 Further opportunities under both Proposed Development options will be explored to improve the efficiency of energy recovery and energy efficiency measures. These include, avoiding the need for supplemental fossil fuel for the G2G option to cover

process heating demand and alternatives to supplementary propane use, which could reduce gross operational emissions by up to 30%. Additional energy efficiency measures will also be explored to reduce imported grid power demand which would benefit both options.

- 3.4.4 The Proposed Development will also seek to achieve BREEAM 'Excellent' standard for the Gateway building (this approach requires the assessment of capital carbon, and encourages the construction of assets with lower capital carbon and lower whole life carbon emissions).

Design (renewables)

- 3.4.5 Alongside the renewables strategy provided in Section 5, heat recovery technologies (using heat sources within the wastewater treatment plant) will be used if the G2G option is selected to replace the heat that would otherwise have been provided by the CHP engines.

The Proposed Development is currently planning for a solar array of ~5.6MWp capacity is estimated to provide up to 19% of the site's power demand, with >95% of the renewable energy generated being utilised within the Proposed Development. The option was considered the optimal balance of utilising the available land area on the site whilst minimising visual impact and impact on the operational effectiveness of the proposed WWTP. The detailed OCMP will provide a final scale of solar generation included within the design before the start of operation.

Operational practices

Building user engagement measures

- 3.4.6 The applicant already implements user engagement activities at its existing sites to drive energy efficiency and will, as a minimum, roll this out to the proposed development.

Transport infrastructure and engagement measures

- 3.4.7 The outline transport logistics plan (OTLP) will detail measures and techniques to reduce the impact of site operations on the road network. This will include timing site deliveries to outside of peak hours and promoting the use of low or zero emissions vehicles to reduce emissions. The applicant already has a net zero plan, which includes a plan to transition its transport fleet to low or zero carbon alternatives.

4 Offsetting Strategy

4.1 Scale of offsets

4.1.1 [Table 4.1](#) sets out a summary of the potential scale of residual emissions that would require offsetting dependent on whether a G2G or CHP option is progressed. Whilst the G2G option remains the applicants preferred option; its offsetting strategy will plan for a reasonable worst case position of being able to cover the residual emissions associated with the CHP option.

Table 4.1 Summary of scale of potential residual emissions to offset under each option

Category	Gas to Grid		CHP	
	Year 1 of operation (2028) - tCO ₂ e/y	Cumulative over 30 year operation - tCO ₂ e	Year 1 of operation (2028) - tCO ₂ e/y	Cumulative over 30 year operation - tCO ₂ e
Power	1,740	14,500	2,050	17,010
Chemicals	50	1,600	20	630
Propane	860	25,890		
Transport	70	2,030	70	2,030
Total Gross Annual Emissions	2,730	44,020	2,130	19,670
Export of biomethane/ CHP generation	-6,210	- 136,710	- 1,030	-8,560
Removals	-30	- 3,080	- 30	-3,080
Total Net Annual Emissions	-3,520	- 95,780	1,080	8,040

4.1.2 The Applicant’s offsetting strategy plans to ensure sufficient offsets are available to cover the potential of up to 1,080tCO₂e of residual operational carbon emissions in year 1 of operation in 2028 and up to 8,040 total net annual emissions.

4.1.3 The Applicant’s overall carbon strategy is focused on continuing to reduce emissions as much as possible and to reduce the reliance on offsets by as much as reasonably practicable. Whilst planning for a reasonable worst case there is confidence that further reductions will be achieved through future design and delivery stages.

4.1.4 The Applicant understands the challenge of securing credible, verified, long-term offsets. It is also aware of significant research and ongoing policy development that are likely to impact the long-term offset market. [The Applicant will ensure it secures](#)

sufficient offsets that balance residual emissions throughout the operation of the Proposed Development.

4.1.5 Therefore, the Applicant's offsetting strategy has identified a number of principles it will follow to work collaboratively to identify offsets that generate real and ideally measurable value, these include:

- Prioritising offsets which generate local and regional value and engaging with local stakeholders to identify these,
- Prioritising offsets that contribute to the long term transition of the local supply chain to net zero,
- Invite challenge from independent industry experts, including local and regional experts, before a final decision on offsets is made.

4.1.6 The Applicant is continuing to review the best value offsets for the local and regional community and those that provide the greatest certainty and credibility. Offsets will look at securing interventions that either support the transition of the local and regional community towards a net zero economy or credibly remove emissions from the atmosphere to have a net benefit towards global GHG atmospheric concentrations. Possible offsets to consider come under the following categories, as defined in section 3.

Carbon Removals

4.1.7 The main carbon removal mechanism associated with the Proposed Development is land use change. The Proposed Development includes a reduction in the area of arable land, whilst increasing the area of grassland and deciduous woodland.

4.1.8 The calculations performed in Section 4.3 of the ES Chapter 10: Carbon (App Doc Ref 5.2.10) estimated the baseline sequestered carbon to be 40tCO₂e/year. In the first year of operation, this value reduces to 30tCO₂e/year as the created deciduous woodland has not yet established itself. Once it does establish itself, the sequestered carbon associated with the land required for the Landscape Masterplan is estimated to be 140tCO₂e/year.

4.1.9 Over the lifetime of the Proposed Development a cumulative 3,080tCO₂e is estimated to be sequestered – assuming that landscape monitoring and maintenance is kept up.

4.1.10 Further development to optimise the overall value of land-use change will continue through later design stages. Offsetting claims from land-use changes will be verified by relevant and qualified standards organisations and reported within the updated detailed OCMP.

Avoidance/Reduction Offsets

4.1.11 Alongside removals, additional offsets will also need to be considered. This will focus, as covered in Section 4.1.5, on offsets which provide local and regional value

and help support the transition by reducing emissions locally and within the projects wider supply chain.

- 4.1.12 The Applicant will look to avoid offsets that claim benefits through preventing the degradation of habitats globally, due to the difficulty in verifying the true additionality and permanence of these measures and limited local value generation.
- 4.1.13 Carbon benefits claimed through the export of biomethane will be evidenced through the capture of RGGO certificates or equivalent.
- 4.1.14 Offsets will likely be secured as part of a long term offsetting strategy for the Proposed Development to cover the expected scale of emissions and detailed of the types and scale of proposed offset will be provided as part of the detailed OCMP.

4.2 Responsibilities

- 4.2.1 The Applicant will ultimately be accountable and responsible for ensuring the offsets are identified and delivered. However, it will look to work with local and regional partners to ensure efficient delivery and buy-in from stakeholders. The details of chosen offsets will be provided as part of ongoing revisions of the detailed OCMP and will be reviewed over the lifecycle of the Proposed Development to ensure offsets are of a sufficient scale to cover any residual operational emissions.

5 Monitoring and Reporting

5.1 Operational carbon

5.1.1 The Applicant will continue to monitor and report their annual operational footprint in line with its regulatory reporting requirements, currently through the Carbon Accounting Workbook (UKWIR, 2023). The emissions associated with the Proposed Development will be reported separately for transparency. The annual reporting will demonstrate that the scale of offsets secured are sufficient to cover residual emissions identified.

5.2 Land Use Change

5.2.1 Monitoring of land use change will be in accordance with landscaping monitoring Table 5.1 of the Landscape Ecology and Recreation Management Plan (LERMP) (App Doc Ref 5.4.8.14).

5.3 Offsetting

5.3.1 Due to the planned ongoing optimization of the Proposed Development following a DCO decision the Applicant will continue to monitor and report the scale of offsetting need required to meet its commitments, in alignment with its regulatory operational emissions reporting requirements, on an annual basis within updated revisions of the detailed OCMP. The Applicant will continue to update the CMP as further decisions are made on which offsets have been identified and what scale of emissions they are able to offset.

6 Plan Updates

- 6.1.1 The OCMP is a live document intended to cover the operational emissions, and particularly residual operational emissions, of the Proposed Development that may need to be offset to achieve operational net zero.
- 6.1.2 An approved detailed OCMP is required prior to the start of operation. Until this has been prepared and approved by the LPA operation cannot commence.
- 6.1.3 The detailed OCMP will continue to be updated annually to report residual operational emissions and associated scale of offsets secured to address these residual emissions.
- 6.1.4 [Table 6.1](#) sets out the minimum number of revisions for the OCMP. The revisions triggers should be updated in the detailed OCMP to account for the outcomes of various decision points.

Table 6.1 Triggers for the update of the Carbon Management Plan

Revision trigger	Timing	Details	Interim updates
Decision on G2G or CHP option	Estimated October 2024	Update to plan to focus on selected option and present strategy including any offsetting measures, related to the specific forecast operational emissions associated with the chosen option, if not completed in previous plan version	
Completion of detailed design	Approval of detailed design	Prepare plan and include measures demonstrating how the design of the Proposed Development has been optimised to reduce residual operational emissions and what offsets have been secured to meet the operational net zero commitment..	Any design choices that have significant impacts on operational emissions
Annual operational emissions reporting	Annually in line with the Applicants regulatory reporting requirements	Annual update on scale of operational emissions to provide scale of operational emissions and confirm scale of offsets secured continue to allow the scheme to be operationally net zero.	

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Get in touch

You can contact us by:



Emailing at info@cwwtpr.com



Calling our Freephone information line on **0808 196 1661**



Writing to us at **Freepost: CWWTPR**

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<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/cambridge-waste-water-treatment-plant-relocation/>