



**Wildlife Trust for  
Beds, Cambs  
& Northants**

Date: 7<sup>th</sup> February 2023

To: The Planning Inspectorate

**Application by Anglian Water Services Limited for an Order Granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation project The Examining Authority's second written questions and requests for information (ExQ2) Issued on 31 January 2024**

Dear Sir / Madam,

**Answer to Biodiversity Q5.3 – Ecological Impacts on Stow-cum-Quy SSSI**

The Wildlife Trust considers the ecological impacts on Stow-cum-Quy SSSI to be as follows:

1. The potential for increased recreational impacts as a result on the opening up of the new permissive paths, with insufficient measures provided to measure the baseline situation and future impacts, nor to manage any impacts should they arise.
2. The potential from surface water pollution from the outfall to the CWWTP site via the Black Ditch.

Biodiversity / Recreational Pressures

The Wildlife Trust's concerns have also been covered by Natural England and we agreed with questions raised at ExQ1 5.12, 5.13, 7.24 & 7.29.

We support the stance taken by Natural England identifying concerns regarding increased recreational pressures and the potential adverse impact of this on Quy Fen SSSI. However, if their suggestion for a post development monitoring approach is taken (pages 18 & 19 of NE's RR (RR-015) further information and reassurances will be required. This approach can only be effective if the management and enhancement measures deemed necessary to minimise and mitigate impacts on Quy Fen SSSI are deliverable and receive the necessary funding. ExQ 7.29 correctly identifies this risk and it is the key question for Anglian Water and Natural England to answer.

In our view, the potential package of mitigation measures for Quy Fen SSSI need to be set out now with a clear legally enforceable mechanism for allocating responsibility and funding for their delivery. Potential mitigation measures could include route signage and design of circular and other walking routes walks that avoid Quy Fen SSSI, specific wardening of Quy Fen at key times, and on site signage and online messaging to encourage positive uses compatible with Quy Fen's status as a SSSI.

ExQ1 7.24 correctly asks the question as to whether the proposed new access routes should even be provided. If a potential mitigation scheme cannot be legally guaranteed or delivered through this DCO application, then perhaps the new access routes bringing increased numbers of people closer to Quy Fen should be excluded from the scheme?

### Pollution

The Wildlife Trust was pleased to note that our concerns were covered by the Environment Agency and Natural England and we agreed with questions raised at ExQ1 21.17, 21.18, 21.37, 21.38 & 21.40.

The Wildlife Trust supported the stance taken by the Environment Agency and Natural England at that stage. The threat of groundwater or surface water pollution to Quy Fen SSSI must be avoided with negligible risk, taking account of catastrophic failures, during construction or operation of CWWTP. The risks from surface water pollution events via the Black Ditch have not been adequately addressed by Anglian Water.

With respect to ExQ 21.17, the Wildlife Trust believes that monitoring once a year is wholly inadequate, and even the EA / NE suggestions for more frequent monitoring still run the risk of pollution events being missed, which would be too late for Quy Fen SSSI. The scheme should be designed to avoid any prospect of such pollution impacts, with the necessary treatment measures put in place (either natural treatment wetlands or “end of pipe” solutions), as well as regular monitoring as suggested by EA / NE. Anglian Water should also specify the potential mitigation measures and operation changes they would implement should a pollution threat or incident be identified. With respect to ExQ 21.37 the monitoring must be undertaken (“should” is not acceptable).

I hope this additional information provides the clarity the ExA is seeking.

Yours sincerely,

Martin Baker MCIEEM

Conservation Manager

