CWWTPR DCO Examination

Submission by Fen Ditton Parish Council at D5

19 February 2024

This is FDPC's submission at D5 with references to the Applicant's revision 7 of the DCO (REP4-003), revised Landscape and Visual Assessment (REP4-032) and the Examining Authority's Second Written Questions (ExQ2). FDPC reaffirms its support to SHH and their submissions.

Reference	FDPC Response	References to Other Documents
DCO V7 (REP4-003) Sch 9 Part 2	FDPC welcomes the correction to the text covering the direction of travel on Horningsea Road.	**DCO V7 (REP4-003)**
DCO V7 (REP4-003) Sch 14 Part 18	Action Points 31 and 32 noted by ExA following ISH3 instruct the Applicant to clarify and ensure consistency in the references to car parking and staff. FDPC suggests the word "operational" is deleted from the text of Sch 14 Part 18. This does not add to the understanding of numbers and type of car parking spaces to be provided for staff whilst also conflating the identification of staff required to operate the proposed WWTW and office staff based at the WWTW. FDPC notes that around 50 parking spaces labelled "site staff" are shown located within the earth bank on Design Plan 4.9.1.	EV-007v Design Plan 4.9.1 (REP1-019)
Action Points EV-007v Points 31 and 32 – Parking and Staff	FDPC will review the Applicant's response to Action Points 31 and 32 since FDPC suggests the Applicant has not justified the relocation of all staff based in Milton House to a new office at the proposed WWTW given the Applicant has indicated these staff carry out their companywide WWTW related functions from Milton House with the clear implication they can carry out their function whilst located away from an office at a WWTW.	
Action Points EV-007v Points 93 - supplemental watering of planting	Further to Action Point 93 noted by ExA following extensive discussion of the need for watering at ISH3, FDPC would welcome the Applicant's response as to whether the use of Treated Sewage Effluent (TSE) had been considered as a source of such water. FDPC is also concerned that the success of the planting, especially on top of the earth bank, could suffer if a Drought Order is imposed. FDPC suggests it would be useful if the Applicant and Environment Agency consider if the watering activity would be authorised in the event of a Drought Order and if the DCO should provide some protection for this activity irrespective of whether TSE is used or not.	

Applicant's revised Landscape and Visual Assessment (REP4-032) Table 2-6 Tall Structures

FDPC notes that the lowest 'tall structure' listed in the table has a height of 8.5m aFGL. However, the table does not describe the number of such structures for each line in the table nor does the table include all the structures where the height is given in the DCO as 8.5m (e.g. the 5 STC storage tanks) or 9m (e.g. the 8 Final Settlement Tanks).

Review of Sch 14 suggests that the number of structures in different height categories is as follows:

DCO Sch14 Part 8 & Part 6 (REP4-007)

Height Category (m aFGL)	<6.5	>6.5 to =<8	>8.1 to =<8.5	>8.6 to =<9	>9.1 to=<10	>10.1	Stacks
WWTW	8	2	0	8	1 nr 60x40	0	2
STC	0	1 nr 20x20	7	6	2	10	3
Workshop					1		
Totals	8	3	7	14	4	10	5

The WWTW structures have FGL at 9m AOD or 9.5m AOD, all the STC structures have FGL at 9m AOD and the Workshop has FGL at 9.5m AOD. These data inform the solid screening provided at the start of operation and subsequent screening as the proposed planting adds to the effective height.

The General Arrangement Plan Sheet 3 (AS-149) shows the earth bank surrounding the proposed treatment works will be 5m high. The top elevation of the bund is not stated on the lines of section given on the Design Plans (REP1-019). The lines of section on the Design Plans show the intersection of the outer edge of the earth bund and existing ground level. Section A-A shows this intersection at around 11m AOD with bank top at around 16m AOD at the southern end (7 m aFGL for the STC) and an intersection at around 8.5m AOD with bank top at around 13.5m AOD at the northern end. Section D-D shows this intersection at around 12m AOD with bank top at around 17m AOD at the western end (7.5/8m aFGL for the WWTW) and an intersection at around 8m AOD with bank top at around 13m AOD at the eastern end. These elevations provide the

General Arrangement Plan Sheet 3 (AS-149)

Design Plan 4.9.2(REP1-019)

	engineered base for the proposed planting and therefore are critical to the initial and subsequent visual screening. Noting EXQ2 10.13 addresses the parameters currently given for Sch 14, FDPC requests that ExA instructs the Applicant to also include the minimum elevations for the top of the earth bank within the DCO Drawings. FDPC points out that it would be impossible to verify original ground levels once topsoil removal and other construction operations have taken place. Lower elevations of the top of the earth bank should not be permitted unless there is equal lowering of the visible structures. FDPC also suggest the DCO or Drawings should add a dimension of 6m for the minimum top width since this is the width considered necessary to provide a 2.5 m wide path and a 3.5 m wide planting area as shown on Figure 3.4 of the LERMP. Table 2-5 of ES Volume 4 Appendix 16.1 indicates that up to 100mm ground lowering will be undertaken to produce 68,592 m3 of material to be used within the proposed bund and landscaping. This equates to around 25% of the total material requirement. The Table also confirms the Applicant expects a slight shortfall in the volume of material required. No lowering of the top elevation or reduction in top width of the earth bank should be permitted even if it were requested by the Applicant in order to make up the shortfall.	EXQ2 (PD-010) LERMP (REP4-056) Appendix 16.1 (APP-132)
Action Points EV-007v Points 91 and 92 - Lowering of Tall structures	Action Points 91 and 92 noted by ExA following ISH3 relate to the height of structures. FDPC requests ExA to extend these questions to also cover further details on the possibility of sinking the base of the tallest structures below the currently proposed 9m AOD FGL of the STC area. FDPC notes that some elevations of the top of the Lower Greensand Formation are included in the Ground Investigation Report. For boreholes BH_STW_013A and BH_STW_022A near the site of the STC elevations are given as -38.06m AOD and -39.14m AOD respectively. This suggest that the depth to the Lower Greensand at the STC would be greater than 47m below a finished ground level of 9m AOD. FDPC questions whether the statement in the Project Description, para 3.4.7, that a 25m deep maximum piling depth “has been set to avoid impacts on the greensands aquifer layer” is over-precautionary given the depth and nature of the Lower Greensand Formation at the	Action Points EV-007v ES Chapter14 App 14.7 (AS-136a) Project Description (REP-022)

	site. FDPC requests the ExA to consider if the elevations for the base of piling given in the DCO V7 could be lowered by, say, 10m if required. FDPC requests the ExA to consider if the above characterisation of the elevation of the top of the Lower Greensand Formation is more accurate than could be interpreted from Table 4-4 of the Drainage Strategy. FDPC notes that a number of structures are proposed that extend into the Lower Chalk below the watertable. For example, Schedule 14 part 4 shows the Primary Settlement Tanks extending to 8m below FGL. This implies that founding a few additional structures into or through this formation is unlikely to have significant adverse impacts on groundwater. FDPC considers that Photomontages 1 for year 1 and Year 15 are examples demonstrating the likelihood of unacceptable visual intrusion as a result of the taller, larger structures in the STC. FDPC will liaise with SHH and review the Applicant's submission against the points noted above.	Drainage Strategy (REP4-074) DCO V7 6 (REP4-007) ES Volume 4 Chapter 15 App 15.1 (APP-127)