



The Planning Inspectorate
The Square Temple Quay
Bristol
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Our ref: AC/2024/132034/01-L01
Your ref: WW010003
Date: 12 March 2024

Dear Sir/Madam

CAMBRIDGE WASTE WATER TREATMENT PLANT RELOCATION ADDITIONAL COMMENTS ON FLOOD RISK ASSESSMENT

In our letter dated 5 January 2024 (AS-175) we provided comments on a draft updated Flood Risk Assessment (FRA) that was submitted to us for review by the Applicant. In this letter, we made it clear that the FRA was unacceptable as it indicated there would be an increase in flood risk within third party land downstream of the site and no mitigation for this was proposed in the FRA. We suggested that an additional model scenario should be run to gain a better understanding of the reason for the predicted increase in flood risk within third party land. We also made it clear that mitigation must be provided to ensure there will be no increase in flood risk elsewhere, in line with the requirements of the National Planning Policy Framework.

We were subsequently sent a revised model report, dated January 2024, that included the results of an additional baseline scenario with planned development in the catchment up to the year 2050 included. However, we were not sent a revised FRA. The results of this additional scenario provide confirmation that the predicted increases in flood extents and depths within third party land are primarily due to increased discharges from the new outfall into the River Cam due to planned development in the catchment up to the year 2050.

During meetings with the Applicant on the 6 and 13 February 2024, we clarified that a mitigation strategy needs to be included in a revised FRA to demonstrate that it will be feasible to provide mitigation at the site in the future, to ensure there is no increase in flood risk to third party land and properties. We have not requested additional model scenarios (as indicated in the Applicant's Deadline 5 Cover Letter Annex A (REP5-001)). But, we have advised that an additional post development model scenario may be required to demonstrate that the proposed mitigation measures will ensure there is no increase in flood risk elsewhere.

The Planning Practice Guidance (paragraph 049) emphasises that the cumulative impacts of development may result in an increase in flood risk elsewhere and clarifies that site-specific FRAs should assess these impacts and demonstrate how mitigation measures have addressed them. We are not aware of any mechanism through the planning system that requires developers to limit foul water discharges

from new development to prevent an increase in volume entering the treatment plant and directly limits the treated effluent to the receiving river to prevent flood risk downstream. As such, we consider that a mitigation strategy needs to be included in the site-specific FRA, which sets out one reasonably feasible option for limiting discharges into the River Cam, to ensure that the cumulative effects of new development do not result in an increase in flood risk elsewhere.

Following our meeting on 13 February 2024 the Applicant informed us that a revised FRA would be submitted to us on 11 March 2024 that would include a mitigation strategy. However, we were recently informed that the Applicant now considers that mitigation is not required, and a revised FRA and additional modelling will now be submitted to us on 22 March 2024.

We have advised the Applicant throughout our engagement that model reviews take us a minimum of three weeks to complete. Therefore, even if this latest submission date is met, we are very concerned that we will not have sufficient time to review the revised FRA and any additional modelling before the end of the Examination. It is also a concern that if a mitigation strategy is not included in the revised FRA, the FRA will be unacceptable and we would essentially be objecting on flood risk grounds.

Yours faithfully

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