

SHH Responses to Examining Authority's Third Written Questions (ExQ3)

SHH 63

CWWTPR DCO Examination

SHH 63

Submission by Save Honey Hill Group

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2 April 2024

These are SHH's responses to the Examining Authority's Third Written Questions (ExQ3). Where relevant, ExQs are also referred to in other SHH submissions being made at D6.

ExQ3 Reference	SHH Response	References to SHH or Other Submissions
1.5 Ministerial Statements	<p>SHH has made comments on the Ministerial Statements in SHH 61, under ExQ2 1.4, where we also refer the ExA to the recent update to the timetable for the GCLP.</p> <p>It would appear from the further DLUHC 'announcement', on 26 March 2024, that the Cambridge Delivery Group is to continue to become a 'dedicated Growth Company' for the Cambridge area. Its role is to be mainly enabling and unlocking infrastructure delivery, but also 'establishing a Cambridge brand' and a 'long term growth strategy'. It is to remain as a non-statutory body, working with the local authorities and other public and private agencies.</p> <p>Crucially, it will not have local plan making or development management powers or the compulsory land acquisition powers, which are normally given to a Development Corporation. For the purposes of this Examination, the ExA should ignore this announcement.</p> <p>It will remain the responsibility of the local planning authorities to progress the emerging local plans, taking realistic account of infrastructure and environmental constraints, as required by the legislation and the NPPF.</p>	SHH 61
6.3 Operational Carbon Emissions Comparison	<p>In SHH's view, Table 4.6 in REP5-032 is a correct presentation of 'like for like' net emission figures for the Alternative CHP Option, the Gas to Grid Option and the existing works. This shows, as SHH has already pointed out, that the Alternative CHP Option has worse Year 1 net emissions per</p>	

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	<p>megalitre than the existing works, which is a surprising finding, for which we have asked the Applicant to justify. Clearly, if the Applicant makes good on their operational net zero commitment from Year 1, the net emissions under the Alternative CHP Option will be zero, if carbon credits or other offsets are secured. Net zero could, and in our view, should be achieved by the installation of on-site solar generation, although the Applicant appears unwilling to commit to this, intending only to install solar generation if the Gas to Grid or other biomethane export options are adopted.</p>	
<p>9.1 Design: Compliance with NPPF para 135(a) to (f)</p>	<p>Para 135 was previously para 130 in the NPPF, July 2021 and is unchanged. In REP1-053, the Applicant dealt with this in very general and procedural terms and did not address the substance of whether the submitted scheme meets the sustainable design requirements set out in para 135 and elsewhere in the NPPF.</p> <p>Although para 135 is couched in terms most easily understood in relation to housing and mixed uses, it is meant to apply to all forms of built development.</p> <p>In SHH’s view, in terms of criterion (a), it has not been demonstrated that the proposed development has the capacity or footprint to function well ‘throughout its lifetime’ without extension and cannot be said to ‘add to the quality of the area’. In terms of criterion (b), the proposed development within open Green Belt remains more visually intrusive than it needs to be, which could have been better achieved with lower height structures on a slightly larger footprint, and the landscape design is flawed and adversely affects the landscape character. The planting on the circular bund will not provide effective winter screening. In terms of criterion (c), the proposed development is not ‘sympathetic to the local character and history’ or to ‘the landscape setting’.</p> <p>In terms of criterion (d), it is difficult for a development of this sort to deliver a ‘strong sense of place’ in the way intended by this phrase. The proposed development is not, taken overall, ‘attractive, welcoming or distinctive’ as a ‘place to work’. Criteria (e) and (f) are really not relevant, although we continue to note the Applicant’s reluctance to embrace the recreational potential of the 70 ha of landscaped areas to be provided around the works.</p>	

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<p>21.1 and 21.2 Flood Risk</p>	<p>The ExA's questions are noted. SHH's view is that it would be highly desirable for the Applicant to make provision if practicable to mitigate the flood risk arising from the 'cumulative' flows, not just those arising merely from the relocation of the works, essentially the shift in location of the outfall. Please see SHH 62 Written Note of Oral Submissions at ISH4, under para 6.1.</p> <p>Further to the ExA's questions in relation to flood risk and noting points raised at ISH4 by FDPC and SHH, SHH draws attention to three details of the application for the proposed development.</p> <p>a) The Environment Agency has recently published¹ tables of Event Duration Monitoring (EDM) data for storm overflows from which the following data of relevance to the application has been taken:</p> <table border="1" data-bbox="577 635 1581 1267"> <thead> <tr> <th>Site Name (WaSC operational) [optional]</th> <th>Year</th> <th>Total Duration (hrs) all spills prior to processing through 12-24h count method</th> <th>Counted spills using 12-24h count method</th> <th>Long-term average spill count</th> </tr> </thead> <tbody> <tr> <td rowspan="4">CAMBRIDGE STW</td> <td>2023</td> <td>1476.22</td> <td>74</td> <td>12.33</td> </tr> <tr> <td>2022</td> <td>0.00</td> <td>0</td> <td>0</td> </tr> <tr> <td>2021</td> <td>0.00</td> <td>0</td> <td></td> </tr> <tr> <td>2020</td> <td>0</td> <td>0</td> <td></td> </tr> <tr> <td rowspan="4">CAMBRIDGE-RIVERSIDE-187 SSO</td> <td>2023</td> <td>0.00</td> <td>0</td> <td>4.00</td> </tr> <tr> <td>2022</td> <td>0.73</td> <td>2</td> <td>4.8</td> </tr> <tr> <td>2021</td> <td>30.20</td> <td>13</td> <td></td> </tr> <tr> <td>2020</td> <td>9.83</td> <td>4</td> <td></td> </tr> <tr> <td rowspan="4">WATERBEACH STW</td> <td>2023</td> <td>78.25</td> <td>6</td> <td>10.50</td> </tr> <tr> <td>2022</td> <td>0.25</td> <td>1</td> <td>12.0</td> </tr> <tr> <td>2021</td> <td>310.25</td> <td>19</td> <td></td> </tr> <tr> <td>2020</td> <td>240.75</td> <td>16</td> <td></td> </tr> </tbody> </table>				Site Name (WaSC operational) [optional]	Year	Total Duration (hrs) all spills prior to processing through 12-24h count method	Counted spills using 12-24h count method	Long-term average spill count	CAMBRIDGE STW	2023	1476.22	74	12.33	2022	0.00	0	0	2021	0.00	0		2020	0	0		CAMBRIDGE-RIVERSIDE-187 SSO	2023	0.00	0	4.00	2022	0.73	2	4.8	2021	30.20	13		2020	9.83	4		WATERBEACH STW	2023	78.25	6	10.50	2022	0.25	1	12.0	2021	310.25	19		2020	240.75	16		<p>SHH 62 para 6.1</p>
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¹ Event Duration Monitoring - Storm Overflows - Annual Returns, available at <https://environment.data.gov.uk/dataset/21e15f12-0df8-4bfc-b763-45226c16a8ac>

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	<p>The Fluvial Modelling report dated September 2023 states on page 4 in the last bullet point that the Riverside CSO was excluded from the model inputs after advice from Anglian Water that it “never flows”. Since the recent data contradicts this advice, SHH recommends that any review of the model includes a check on how much flood flow from the Cambridge sewerage system could have been ‘lost’ from any historic data used to support the FRA and if this loss might be significant.</p> <p>The EDM data also show that storm overflows from Cambridge WWTP were substantially more numerous in 2023. The Storm Model report page 6 items 3 and 4 describe how the performance of the existing works has been used to develop the design of the proposed works. SHH suggests the Applicant should confirm if the most severe of their observed inflow hydrographs from 2023 and early 2024, a very wet period, suggest that the hydrographs used to develop the design may underestimate the baseline inflows.</p> <p>b) The ES Chapter 20 Water Resources para 4.2.108 concludes that the proposed design would result in a reduction in the frequency of storm overflow events which is considered to be a minor beneficial due to its impact on water quality. In contrast, SHH draws attention to the concern that the Application also provides for the expansion of the drainage catchment area as shown on ES Chapter 3- Site Selection Figure 2.2, including the transfer of the Waterbeach WWTW, which may decrease water quality in the River Cam between the Cambridge WWTW outfall and will increase flows upstream of Bottisham Lock because of the additional discharge through the twin 500mm pipelines (Project Description para 2.8.9) from Waterbeach.</p> <p>c) The DCO Schedule 14 Part 21 provides for finished ground level at the Outfall Works to be + or – 0.5m from existing ground level. A value of 4.5m AOD is given for 0.0m above FGL, therefore the finished level could be as high as 5.0m AOD. At ISH4, FDPC queried if such a ground level rise could have the potential to increase flood risks. The Applicant confirmed that the potential 0.5m rise in ground levels had not been incorporated in the FRA model.</p>	<p>Appendix 20.5 (AS-113)</p> <p>Appendix 20.10 (APP-160)</p> <p>ES Chapter 20 (REP4-036)</p> <p>ES Chapter 3 (AS-018)</p> <p>Project Description (REP4-022)</p> <p>DCO (REP5-003)</p>
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	<p>SHH notes that the clear opening between the A14 overbridge abutments is of the order of 60m wide and that the proposed outfall is immediately downstream of this bridge. If the outfall structure is 7m wide as stated in the DCO Part 21, it would block around 16% of the conveyance space above existing ground level up to the level at which flows overtopped any raised section. Figure 4.6 of the Fluvial Modelling report shows the retained water level at Bait's Bite is 3.85m AOD and that the return period for an elevation of 4.5m AOD is between 1:30 and 1:40 years. SHH recognises that changes to the river channel geometry and lining materials are proposed and these could also affect the flood level-discharge relationship in the river. Although not having specialist experience, SHH recommends that either the Applicant should be asked to confirm if the identified potential for partial blocking of flood flows would cause the frequency of flooding at these elevations to increase unless these changes would be trivial in comparison to other changes to the river or, otherwise, the LLFA should confirm it would be examining this point as part of its approval of the detailed design required by the Protective Provisions in Schedule 15 Part 10 of the DCO.</p>	<p>Appendix 20.5 (AS-113)</p>
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