

Cambridge Waste Water Treatment Plant Relocation Project Anglian Water Services Limited

Flood Risk Assessment

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Summary

The Proposed Development involves the construction of a new waste water treatment plant (WWTP) and sludge treatment centre (STC), together with the associated waste water transfer infrastructure comprising waste water transfer tunnel, sewer rising main diversions and a treated effluent transfer with an outfall to the River Cam. The Proposed Development also includes a transfer pipeline corridor from Waterbeach Water Recycling Centre (WRC). The proposed WWTP would <u>be</u>-include above <u>and below ground structures</u>, <u>andbut</u> associated tunnels and pipelines which connect to proposed or existing infrastructure will be -below ground.

The Environment Agency Flood Map for Planning demonstrates that the 'Less Vulnerable' proposed WWTP would be located entirely within Flood Zone 1. 'Water compatible' infrastructure (outfall, pipelines and tunnel) which are located in Flood Zones 2 and 3 would not be considered to be at high risk from fluvial flooding, assuming the application of best practice construction methodology.

Fluvial modelling, which includes climate change allowance, indicates that the increased discharge from the proposed outfall would have a negligible effect on River Cam water levels, flows and flood extents.

Fluvial modelling compares the fluvial flows inclusive of treated effluent from the existing WWTP, to those from the proposed WWTP. The existing Cambridge WWTP supports the current Greater Cambridge population. The proposed WWTP includes phased development to support expected population growth to the year 2041. Three model scenarios were run in order to decouple flood risk related solely to the location and discharge infrastructure of the proposed WWTP, from flood risk related to predicted population growth to the year 2041. Results are summarised as follows;

Fluvial Impact due to relocation of WWTP

 The proposed WWTP would have a negligible impact on fluvial flood risk compared to the existing Cambridge WWTP, when the same (2041) population assumption is applied to both models, and no mitigation is required.

Fluvial Impact due to population growth

 As population increases from the present day to the year 2041, there may be slightly increased flood depths (centimetres), to third party receptors located in Flood Zone 3 which are currently at risk of flooding. Receptors potentially impacted due to population growth include agricultural land between Milton and Waterbeach and at Cam Washes SSSI, residential properties at Bannold Road, Long Drove and Dimmock's Cote Road, and marinas at Cambridge Motor Boat Club and the Fish and Duck Marina. Increased flood depths occur typically for only one or two specific modelled events, which vary per location, and do not propagate through to higher order events. There would



be no change in flood hazard classification at residential receptors resulting from these slight increases in flood depths.

 In terms of both location and severity, there is inconsistency in modelled population growth impacts on third-party receptors across different modelled flood events. This combined with conservative modelling assumptions, introduces uncertainty regarding whether there is a genuine impact. The pathway to securing mitigations to address these uncertain impacts is discussed in Appendix C.

A cofferdam will be used to maintain dry conditions during construction of the outfall. The cofferdam is expected to be constructed in two sections: a land section and a river section. Construction behind the land section of the cofferdam is expected to take up to four months. The river section of the cofferdam will be in place for a limited period of approximately eight weeks to minimise river constriction impacts. The river section of the cofferdam may reduce the cross-sectional area of the River Cam which may result in temporary locally increased water-levels and/or velocities within the vicinity of the constriction. The risk to fluvial flood risk elsewhere may slightly increase during the limited time (approximately eight weeks) that the river section of the cofferdam is in place.

Monitored groundwater levels (2021-2022) at the proposed WWTP are relatively close to existing ground level. The proposed WWTP will be situated in an excavated area and, at times of year when groundwater levels are high, the unmitigated risk of groundwater flooding within the proposed WWTP is considered medium to high. Emergent groundwater within the proposed WWTP site will however be managed by the Drainage Strategy (Application Document Reference 5.4.20.12), in combination with surface water runoff.

The surface water (pluvial) flood risk at the site required for the construction of the proposed WWTP is considered very low. However, the proposed WWTP would be located in an excavated area which lies slightly below external ground level and may therefore be at increased risk of surface water (pluvial) ponding. Surface water runoff within the proposed WWTP and access roads will be managed by the Drainage Strategy (Application Document Reference 5.4.20.12).

The Drainage Strategy (Application Document Reference 5.4.20.12) includes dedicated drainage for areas of the proposed WWTP which present a contamination risk. Potentially contaminated surface water runoff will be returned to the head of the works for treatment. Runoff from uncontaminated areas and emergent groundwater, if present, will be directed to an attenuation pond located within the land required for the landscape masterplan. Outflow from the attenuation pond will be restricted to greenfield runoff rates and discharged to a drain linked to Black Ditch.



1 Proposed Development settingSetting

1.1 Commission

- 1.1.1 The Cambridge Waste Water Treatment Plant Relocation (CWWTPR) project is a Nationally Significant Infrastructure Project (NSIP) (Department for Environment, Food & Rural Affairs, 2012), as defined in the Planning Act Section 29 (Planning Act, 2008) and requires a Development Consent Order (DCO).
- 1.1.2 This Flood Risk Assessment (FRA) has been prepared to the support the DCO application.
- 1.1.3 The aim of this FRA is to assess the flood risk to the Proposed Development and its potential impact on flood risk. Operational and construction flood risks are considered.

1.2 Setting and topography

- 1.2.1 The Proposed Development (Appendix B Figure 1) involves the construction of a waste water treatment plant (WWTP) and a sludge treatment centre (STC), together with associated waste water transfer infrastructure, comprising a waste water transfer tunnel, treated effluent transfer and stormwater pipelines with an outfall to the River Cam. The Proposed Development also includes a transfer pipeline corridor from Waterbeach Water Recycling Centre (WRC). The proposed WWTP would be above ground, but associated tunnels and pipelines which connect to proposed or existing infrastructure, will be below ground. The Proposed Development includes the provision of a bridleway extension along a 1km stretch of disused railway.
- 1.2.2 The current Scheme Order Limits (Appendix B Figure 1) cover an area of approximately 250Ha.
- 1.2.3 The proposed WWTP will replace the existing Cambridge WWTP, both of which are shown in Appendix B Figure 1. The Proposed Development will include below-ground pipelines and tunnels connecting to existing and proposed infrastructure.
- 1.2.4 The land required for the construction of the proposed WWTP is located approximately 1.5km south-east of the existing Cambridge WWTP. The site is approximately 22ha in size, located within a wider 95ha development area of land which is required for the landscape masterplan.
- 1.2.5 The Proposed Development is located in an area that is currently predominantly greenfield. The land required for the landscape masterplan is currently used for arable farming and sown with crops such as barley and wheat.
- 1.2.6 Within the land required for construction of the proposed WWTP, topographic elevations vary between 7.1mAOD and 11.4mAOD (2m LiDAR data), sloping to the east/north-east. The footprint of the proposed WWTP will be adjusted (excavation and partial fill) to a ground level of between 8.5mAOD to 9.5mAOD.



1.2.7 Topographic elevations within the land required for the landscape masterplan vary between approximately 3mAOD and 16mAOD (<u>based on 2m resolution LiDAR data</u>). Lowest topographic elevations are observed in the vicinity of the River Cam with the highest elevations associated with the A14 (Appendix B Figure 2).

1.3 Geology

- 1.3.1 The Geology of Britain Viewer (British Geological Survey, 2022) indicates that the bedrock <u>geology</u> underlying the Scheme Order Limits consists of the West Melbury Marly Chalk Formation and the Gault Formation (Appendix B Figure 3).
- 1.3.2 The West Melbury Marly Chalk Formation, comprising soft, marly chalk and hard grey limestone, is part of the Grey Chalk sub-group. The land required for the construction of the proposed WWTP is located on the West Melbury Marly Chalk Formation.
- 1.3.3 The underlying Gault Formation comprises clay and mudstone. The Gault Formation is present along the west of the Scheme Order Limits, for example underlying the existing WWTP.
- 1.3.4 Superficial deposits underlying the Proposed Development are River Terrace Deposits (sand and gravel), Alluvium (clay, silt, sand and gravel) and some Peat (British Geological Survey, 2022). Superficial deposits are absent within the land required for the construction of the proposed WWTP, according to BGS 1:50,000 mapping (Appendix B Figure 3) and confirmed by ground investigation works.

1.4 Watercourses

- 1.4.1 Watercourses present within the vicinity of the Proposed Development are shown in Appendix B Figure 4.
- 1.4.2 The River Cam, which is classified as an Environment Agency main river, is approximately 1km west of the land required for the construction of the proposed WWTP (Appendix B Figure 4). The river will be crossed by below-ground infrastructure (tunnel and pipelines) of the Proposed Development.
- 1.4.3 Quy Water, which is classified as an Environment Agency main river, is located approximately 1km east of the land required for the construction of the proposed WWTP. Quy Water discharges to Bottisham Lode (also which is classified as an Environment Agency main river), which in turn discharges to the River Cam (Appendix B Figure 4). Numerous drains and ditches are present within and close to the Scheme Order Limits. Drainage channels on the eastern side of the proposed WWTP discharge to Black Ditch. Black Ditch flows to the north to Bottisham Lode, which then discharges to the River Cam near Waterbeach.
- 1.4.4 The drainage catchments are managed by Swaffham Internal Drainage Board (IDB) and Waterbeach Level Internal Drainage Board (The Drainage Office, 2022).



1.5 Vulnerability classification

- 1.5.1 The Scheme Order Limits incorporates both the existing Cambridge WWTP and greenfield areas. The DCO application includes the Waterbeach waste water transfer pipeline, but does not include the pumping station or associated infrastructure at the existing Waterbeach WRC, located at the north of the Scheme Order Limits.
- 1.5.2 According to National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing and Communities, 2021) and Planning Practice Guidance flood risk vulnerability classification (Department for Levelling Up, Housing and Communities, 2022) the proposed WWTP and associated infrastructure could be classified under various vulnerability criteria (shown in Table 1-1).
- 1.5.3 The Scheme Order Limits include greenfield areas, which are unclassified according to the NPPF flood risk vulnerability guidelines. Post-development, the greenfield areas within the Scheme Order Limits will generally increase in vulnerability to Less Vulnerable/Water Compatible.

Vulnerability Classification	Description	Post-development
Water Compatible	Water/sewage transmission infrastructure and pumping stations. Amenity open space, nature conservation and biodiversity, outdoor sports and recreation.	 Transfer tunnel Final Effluent & stormwater pipelines Outfall Waterbeach pipeline Proposed bridleway extension
Less Vulnerable	Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.	Proposed WWTP

Table 1-1: Flood Risk Vulnerability classification with respect to the Proposed Development

Source: Environment Agency/NPPF guidelines

1.6 Flood zones

- 1.6.1 The Environment Agency Flood Map for Planning (Appendix B Figure 5) demonstrates that the Proposed Development is located within Flood Zones 1, 2 and 3, which have a low, medium and high probability of flooding respectively. Flood risk associated with the flood zones is described in full in Table 1-2, but can be summarised for river flooding as follows:
 - Flood Zone 1 has a less than 1 in 1000 year (0.1%) annual probability of river flooding
 - Flood Zone 2 has a 1 in 1000 year to 1 in 100 year (0.1% to 1%) annual probability of river flooding



- Flood Zone 3 has a greater than 1 in 100 year (1%) annual probability of river flooding.
- 1.6.2 The Environment Agency Flood Zone mapping withingwithin the vicinity of the Scheme Order Limits is based on fluvial modelling only, indicating that tidal flooding is not a significant risk in this area.
- 1.6.3 The Environment Agency Flood Map for Planning shows only the potential floodplain. The mitigating effects of any flood defences currently in place are not considered.
- 1.6.4 The land required for the construction of the proposed WWTP is sequentially located entirely within Flood Zone 1 which has a low probability of flooding from rivers or sea in any year (Table 1-2).
- 1.6.5 Below-ground pipelines and tunnels will however pass through Flood Zones 2 and 3 of the River Cam, which have a medium to high probability of flooding from rivers or sea in any year.
- 1.6.6 The land required for the bridleway designation extension is in Flood Zones 2 and 3 of Black Ditch (Appendix B Figure 5).



Table 1-2 Definition of the NPPF Flood Zones.

Flood Zone	Description
1	Low Probability. This zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).
2	Medium Probability. This zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding ($1\% - 0.1\%$) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding ($0.5\% - 0.1\%$) in any year.
3a	High Probability. This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.
3b	The Functional Floodplain. This zone comprises land where water has to flow or be stored in times of flood. SFRA's should identify this Flood Zone (land which would flood with an annual probability of 1 in 20 (5%) or greater in any year or is designed to flood in an extreme (0.1%) flood, or at another probability to be agreed between the LPA and the EA, including water conveyance routes). The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise: • land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or • land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding). Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency

1.7 Sequential Test/Exception Test

1.7.1 The National Policy Statement (NPS) on Wastewater, Paragraph 4.4.14 (Department for Environment, Food & Rural Affairs, 2012) and the 2022 update of the Flood risk and Coastal Change section of the Planning Practice Guidance -(Department for Levelling Up, Housing and Communities, 2022) require that new planning applications undergo a Sequential Test. The Sequential Test requires the location of newis designed to guide development to an area of toward areas with the lowest flood-risk of flooding. Where there are no reasonable alternatives, sites in areas of higher flood risk may be considered, depending on the flood risk vulnerability of the Proposed Development, and an Exception Test may need to be passed.



- 1.7.2 The flood risk vulnerability and flood zone compatibility table from the 2022 update of the Flood Risk and Coastal Change section of the Planning Practice Guidance (Department for Levelling Up, Housing and Communities, 2022) is shown in Table 1-3, with highlighted cells indicating elements of the Proposed Development. Flood risk vulnerability with respect to the Proposed Development is defined in_Table 1-1.
- 1.7.3 The 'Less Vulnerable' proposed WWTP would be sequentially located within Flood Zone 1 and therefore passes the Sequential Test.
- 1.7.4 'Water Compatible' elements of the Proposed Development are deemed appropriate development within Flood Zones 1, 2, and 3a in accordance with the flood zone compatibility table (Table 1-3). However, additional considerations (indicated in Table 1-3 as ✓*) are required for Water Compatible development in Flood Zone 3b¹ (the functional floodplain), where development should be designed and constructed to:
 - remain operational and safe for users in times of flood,
 - result in no net loss of floodplain storage,
 - not impede water flows and not increase flood risk elsewhere.
- 1.7.5 Below ground pipelines and tunnel elements of the Proposed Development located in Flood Zone 3b would remain operational during flood conditions and would have a negligible impact on floodplain storage, surface water flows or flood risk elsewhere. The 'Water Compatible' elements of the Proposed Development in Flood Zone 3b, may therefore be considered appropriate development according to Table 1-3.

¹ Flood Zone 3b designations are shown in Greater Cambridge Strategic Flood Risk Assessment (SFRA) Appendix D6



Table 1-3: Sequential Test. Flood Risk Vulnerability and Flood Zone 'Compatibility' Table.

Flood Risk Vulnerability Classification	Essential Infra- structure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
Flood Zone 1	✓	✓	✓	✓ Proposed WWTP	 ✓ Transfer tunnel Final Effluent & stormwater pipelines Waterbeach pipeline Proposed bridleway extension
Flood Zone 2	✓	Exception Test Required	✓	✓	 ✓ Transfer tunnel Final Effluent & stormwater pipelines Waterbeach pipeline Proposed bridleway extension
Flood Zone 3a	Exception Test Required	×	Exception Test Required	✓	 Transfer tunnel Final Effluent & stormwater pipelines Waterbeach pipeline Proposed bridleway extension Outfall
Flood Zone 3b	Exception Test Required	×	×	×	 ✓* Transfer tunnel Final Effluent & stormwater pipelines Waterbeach pipeline Proposed bridleway extension Outfall

✓ development is appropriate; ***the development should not be permitted; ✓* further considerations required; highlighted cells (pink) indicate elements of the Proposed Development.



2 Flood Risk to the Proposed Development

2.1 Fluvial flooding

Flood defences

- 2.1.1 The fluvial flood defences (Appendix B Figure 6) along the River Cam generally consist of high ground, to a 1 in 10 year (10%) standard of protection-<u>(Environment Agency</u>, 2024).
- 2.1.2 In the Waterbeach area, the standard of protection of the embankments on the River Cam is 1 in 100 year (1%). The area downstream area of Waterbeach is therefore considered to 'benefit from defences' (to a 1 in a 100 year standard of protection) as indicated in Appendix B Figure 5.%) (Environment Agency, 2024).
- 2.1.3 Pipeline and tunnel crossings below the flood defences of the River Cam may require an Environment Agency Flood Risk Activity Permit for work within 8m of EA flood defences, or for excavation within 16m of flood defences.
- 2.1.4 The outfall structure, which will be located on the east bank of the River Cam, will require an Environment Agency Flood Risk Activity Permit for work within 8m of EA flood defences.
- 2.1.5 Along Quy Water (Appendix B Figure 4), flood defences in the form of high ground and embankments are not assigned a standard of protection by the Environment Agency (Appendix B Figure 6). It is assumed that the standard of protection of the flood defences in this area is low.
- 2.1.6 Bottisham Lode (Appendix B Figure 4) also has flood defences that alternate between high ground and embankments. The flood defence standard of protection (Appendix B Figure 6) varies along Bottisham Load between 1 in 50 year (2%) and 1 in 100 year (1%).%) (Environment Agency, 2024).

Existing fluvial flood risk

- 2.1.7 Flood zones in relation to the Proposed Development are discussed in Section 1.6.31.6
- 2.1.8 Fluvial modelling has been undertaken (Application Document Ref 5.4.20.5: Fluvial model report) based on the River Cam Urban model² (JBA, 2023). The fluvial modelling includes additional inflow locations for the existing and proposed outfall discharges, which were not explicitly represented in the River Cam Urban model. The modelled flood outlines include the mitigating effects of existing flood defences.
- 2.1.9 The assessment of flood risk to the Proposed Development includes consideration of all modelled events: 1 in 2 year, 1 in 10 year, 1 in 20 year, 1 in 30 year, 1 in 75 year, 1

² The River Cam Urban model is currently being updated by the Environment Agency. However the updates have not been finalised and therefore the 2012 model (JBA, 2023) remains the best available data.



in 100 year, 1 in 100 year plus 9% CC, 1 in 100 year plus 19% CC, 1 in 100 year plus 45% CC, 1 in 200 year, and 1 in 1000 year.

- 2.1.92.1.10 Modelled flood outlines (Appendix B Figure 7) demonstrate that the land required for the construction of the proposed WWTP would not be at risk in any fluvial flood event from the 1 in 2 year to the 1 in 1000 year event. Fluvial flood risk adjacent to the land required for the landscape masterplan would largely be confined to the immediate vicinity of the River Cam.
- 2.1.102.1.11 <u>Stage Baseline flood extent, flood</u> level and flow flood depth data for nodes along the River Cam have been provided in the fluvial <u>Model modelling</u> report (Application Document Ref 5.4.20.5). Node CA17720 is upstream: Fluvial modelling report). Flood levels west of the Proposed Development (Appendix B Figure 8). in a 1%AEP in 100 year event, the modelled stage level at this node is 5.22mAOD would be approximately 4.80mAOD, and in a 0.1%AEP in 1000 year event the modelled stage level is 5.67mAOD.would be 5.20mAOD. As the topographic elevation within the proposed WWTP would be at least 8.50mAOD, it the ground level for the proposed WWTP will be at least 2.8mapproximately 3.30m above the modelled 0.1% AEP in 1000 year peak flood level.
- 2.1.12 Within the vicinity of Waterbeach, flooding in the 1 in 100 year event would affect the floodplain south of Bannold Road, between the railway line and the River Cam to a maximum flood depth of 1.41m. The mitigating effect, if any, of the IDB-managed pumping station at Bottisham Lock is not considered in the model.
- 2.1.112.1.13 The risk of fluvial flooding in all events, up to and including the 0.1%AEP,1 in 1000 year event,, may be considered low for the land required for the construction of the proposed WWTP, and medium to high in the vicinity of the River Cam. Water compatible infrastructure (outfall, pipelines and tunnel) in the vicinity or the River Cam would not be considered to be at high risk from fluvial flooding, assuming the application of best practice construction methodology.

Climate change: fluvial

- 2.1.122.1.14 Climate change is likely to mean changes in future weather patterns, with warmer temperatures, sea level rise, seasonal rainfall changes and more extreme events. The Proposed Development is likely to be at more risk of flooding in the future.
- 2.1.132.1.15 A summary of the Environment Agency peak river flow allowances for climate change is shown in Table 2-1Table 2-1 (Environment Agency, 2021), (Environment Agency, 2022) where highlighted cells are those relevant to the Proposed Development. Peak river flow allowances are based on percentiles:
 - the central allowance is based on the 50th percentile;
 - the higher central allowance is based on the 70th percentile;
 - the upper end allowance is based on the 90th percentile.



2.1.142.1.16 In Flood Zones 2 and 3, the central climate change allowance is applicable to 'Water Compatible' developments as shown in <u>Table 2-1Table 2-1</u>Table 2-1. For definitions of vulnerability, see Table 1-1.

Flood Zone 2	Essential Infrastructure Higher central	Highly vulnerable Central	More Vulnerable Central	Less Vulnerable Central	Water Compatible Central
3a	Higher central	Central (development not permitted)	Central	Central	Central
3b	Higher central	Development should not be permitted	Development should not be permitted	Development should not be permitted	Central

Table 2-1: Development vulnerability, flood zones and peak river flow allowances.

Source: Summarised from (Environment Agency, 2021(b)). Highlighted cells (pink) indicate Proposed Development.

2.1.152.1.17 Environment Agency guidance for flood risk assessments states that Nationally Significant Infrastructure Projects (NSIPs) may need to assess the flood risk from a credible maximum climate change scenario. Where it is appropriate to apply a credible maximum scenario, the upper end allowance should be used, in accordance with the relevant national policy statement.

2.1.162.1.18 The National Policy Statement on Wastewater, Paragraph 3.6.10 (Department for Environment, Food & Rural Affairs, 2012) states:

'The decision maker should be satisfied that there are not critical features of the design of new waste water infrastructure which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (e.g. by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or the Environment Agency) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime'.

- 2.1.172.1.19 The proposed WWTP is sequentially located in Flood Zone 1. Only the outfall and short sections of below-ground transmission infrastructure, such as the tunnel and pipelines, will be located with Flood Zones 2 and 3. Consideration of the credible maximum scenario and use of the upper end allowance would be considered overly conservative for the elements of 'Water Compatible' infrastructure located in Flood Zones 2 and 3.
- 2.1.182.1.20 Based on the peak river flow allowance categories identified in Table
 2-1Table 2-1Table 2-1 and in consideration of the life-time of the development to the 2080s epochlifespan of the Proposed Development well into the 2090s, as described in Document Ref 5.2.2: Chapter 2: Project Description, it is considered that the Central (9%) peak river flow allowance is applicable, as shown in Table 2-2 (Environment Agency, 2021 (a)). However, as the Proposed Development is a



Nationally Significant Infrastructure Project, consideration is also given within this assessment to the higher climate change allowances.

	I Cak IIVEI IIOW a	nowance cam and i	Liy Ouse catchinent	
River basin district	Allowance category	Total potential change anticipated for	Total potential change anticipated for the	Total potential change anticipated for the '2080s'
		the '2020s'	'2050s'	-(2070 to 2115)
		(2015 to 2039)	(2040 to 2069)	
Cam	Upper end	21%	22%	45%
and Ely	Higher central	7%	5%	19%
Ouse	Central	2%	-2%	9%

Table 2-2: Peak river flow allowance Cam and Ely Ouse Catchment

Source: Environment Agency. Highlighted cell (pink) indicates Proposed Development.

- 2.1.19 Flood modelling reported within the Fluvial Model Report (Application Document Ref 5.4.20.5), which is based on the River Cam Urban model (Halcrow, 2012), incorporates a 20% climate change allowance (1%AEP + 20%CC).
- 2.1.20 It is understood that the River Cam Urban model (Halcrow, 2012) is being updated to include current climate change allowances (Table 2-2). However, updates have not been finalised at the time of this report and therefore the 2012 model remains the best available. The blanket 20% climate change allowance may be considered conservative with respect to the Central allowance of 9% (for the 2080s epoch).
- 2.1.21 Flood outlines for the 1%AEP & 20 in 100 year plus 9%CC, 19%CC and 45%CC (Appendix B Figure 9) demonstrate that the land required for the construction of the proposed WWTP would not be at risk in this eventthese events. Flooding in this eventthese events would largely be confined to the immediate vicinity of the River Cam between the existing and proposed WWTP. Stage level and flow data for nodes along the River Cam have been provided in the fluvial modelling report (Application Document Ref 5.4.20.5: Fluvial model report). Node CA17720 is upstream of the proposed development (Appendix B Figure 8). In a 1%AEP + 20%CC event, the modelled stage level at this node is 5.31mAOD. As the average topographic elevation within the proposed WWTP will be at least 8.5mAOD, the proposed WWTP will be at least 3m above the modelled 1%AEP + 20%CC peak flood level.
- 2.1.22 Flood extent, flood level and flood depth data have been provided in the fluvial modelling report (Application Document Ref 5.4.20.5: Fluvial modelling report). Flood levels west of the Proposed Development in the 1 in 100 year plus 9%CC event would be approximately 4.85mAOD. As the topographic elevation within the proposed WWTP would be at least 8.50mAOD, it will be at least 3.65m above the modelled 1 in 100 year plus 9%CC peak flood level.
- 2.1.23 Within the vicinity of Waterbeach, flooding in the 1 in 100 year plus 9%CC event would affect the floodplain south of Bannold Road between the railway line and the River Cam to a maximum flood depth of 1.49m. Any mitigating effect of the IDBmanaged pumping station at Bottisham Lock is not considered.



2.1.222.1.24 The risk of fluvial flooding in the 1%AEP + 20 in 100 year plus 9%CC event may be considered **low** in the land required for the construction of the proposed WWTP, and along the majority of the Waterbeach pipeline route... Fluvial flood risk may be considered medium to high in the vicinity of the outfall and pipeline and tunnel crossings of the River Cam, including the floodplain area east of Waterbeach.

2.2 Surface water (pluvial) flooding

Existing surface water flood risk

- 2.2.1 Cambridgeshire Local Flood Risk Management Strategy -(Cambridgeshire County Council, 2022) lists 275 surface water 'wet spots', based on <u>historic</u> flood risk to properties over the time period 2015-2020. The Proposed Development is located in a greenfield location however, in an area that has not been specifically assessed as part of Cambridgeshire LFRMS wet spot analysis.
- 2.2.2 The Environment Agency Extent of Flooding from Surface Water map (Appendix B Figure 10) Figure 9Figure 10) shows that the Proposed Development will be predominantly located in an area considered to be at very low risk (less than 0.1% chance of flooding annually) from surface water flooding.
- 2.2.3 There is an area at low risk of surface water ponding, to the north of the <u>below-ground</u> Waterbeach pipeline, in the vicinity of Bannold Road. This may be due to entrapment by the railway track and ignores the effect of any existing mitigating drainage, if present.
- 2.2.4 The proposed WWTP will be located in an excavated area slightly below external ground level. Areas of low topographic elevation within the proposed WWTP may therefore be at **increased risk** of surface water (pluvial) ponding. As the earth banks surrounding the proposed WWTP will not be continuous, there is also a further minor risk of runoff from external areas into the excavation-will be mitigated by local raising of areas adjacent to the earth bank, as shown in the Drainage Strategy (Application Document Ref 5.4.20.12). The raised areas will direct runoff away from the proposed WWTP towards ridges and furrows within the land required for the landscape masterplan, which will control and attenuate runoff to the catchment, as discussed in the Drainage Strategy (Application Document Ref 5.4.20.12).
- 2.2.5 Surface water runoff from site will be managed through a Drainage Strategy (Application Document Ref 5.4.20.12), which considers the Environment Agency climate change allowances for peak rainfall intensity. <u>Table 2-3Table 2-3</u>Table 2-3.
- 2.2.6 The Drainage Strategy (Application Document Reference 5.4.20.12) includes dedicated drainage for areas of the proposed WWTP which present a contamination risk. Potentially contaminated runoff will be returned to the head of the works for treatment.
- 2.2.7 Runoff from uncontaminated hard surfaces will be attenuated by the drainage system and directed to an attenuation pond within the land required for the



landscape masterplan. Outflow from the pond will be restricted to greenfield runoff rate and discharged to a drain linked to Black Ditch.

Climate change: surface water

- 2.2.8 Climate change will increase peak rainfall intensity in small and urban catchments. The Proposed Development will be at more risk of surface water flooding in the future. The Environment Agency climate change allowances for peak rainfall intensity are shown in <u>Table 2-3Table 2-3</u>.
- 2.2.9 The Drainage Strategy (Application Document Reference 5.4.20.12) includes provision for 40% climate change with respect to surface water runoff within the proposed WWTP and associated hard surfaces.

Table 2-3: Peak rainfall intensity allowance in small and urban catchments

	3%	3% AEP		1% <u>AEP</u>	
Allowance	2050s epoch	2070s epoch	2050s epoch	2070s epoch	
Central	20%	20%	20%	25%	
Upper End	35%	35%	40%	40%	

Source Environment Agency, updated May 2022

2.3 Groundwater flooding

- 2.3.1 The British Geological Survey (BGS) Geology of Britain Viewer demonstrates that the bedrock underlying the Scheme Order Limits consists of the West Melbury Marly Chalk Formation (Grey Chalk Sub-group) and the Gault Formation (Appendix B Figure 3).
- 2.3.2 The Grey Chalk sub-group is considered to be a Principal aquifer (Department for Environment, Food & Rural Affairs, 2022). A Principal aquifer is highly permeable, supporting water supplies and/or river base flow at a strategic scale.
- 2.3.3 The Gault Formation is classified as an Unproductive aquifer (Department for Environment, Food & Rural Affairs, 2022).
- 2.3.4 The Geology of Britain Viewer (British Geological Survey, 2022) indicates that the superficial deposits, where present, are River Terrace Deposits (sand and gravel), Alluvium (clay, silt, sand and gravel) and some Peat. Superficial deposits are absent within the land required for the construction of the proposed WWTP according to BGS 1:50,000 mapping and ground investigation works.
- 2.3.5 River Terrace Deposits and Alluvium are classified as Secondary A aquifers (Department for Environment, Food & Rural Affairs, 2022). A Secondary A aquifer is permeable, supporting water supplies at a local scale and may contribute to base flow of rivers.
- 2.3.6 The Proposed Development will not be located within an Environment Agency groundwater Source Protection Zone (SPZ) (Department for Environment, Food & Rural Affairs, 2022). The closest groundwater SPZ is approximately 2.5km south-east of the Proposed Development.



- 2.3.7 The Greater Cambridge Strategic Flood Risk Assessment (SFRA) Appendix D10 susceptibility to groundwater flooding (Stantec on behalf of Greater Cambridge Shared Planning, 2021) indicates that the proposed WWTP will be located in an area where there is potential for groundwater flooding either at the surface or for structures below ground level.
- 2.3.8 Susceptibility to groundwater flooding maps identify areas where geological conditions and available groundwater level data indicate that a rise in groundwater could occur under certain circumstances. A high susceptibility to groundwater flooding does not mean that groundwater flooding has occurred in the past or will in the future. Susceptibility to groundwater flooding mapping, coupled with site specific hydrogeological data, is used to identify a potential risk and to plan for such a risk.
- 2.3.9 Below-ground water-compatible transmission infrastructure elements (pipelines and tunnel) and below-ground deep foundations and shafts of the Proposed Development would not be considered at risk of groundwater flooding or inflow, assuming best practice construction methodology.
- 2.3.10 Groundwater level monitoring locations at, and in close vicinity to the proposed WWTP, rangedindicated groundwater level variation between approximately 0.5m and 5m below ground level between August 2021 and May 2022
- 2.3.11 The proposed WWTP will be located in an excavated area slightly below external ground level. Excavated areas within the proposed WWTP may be at increased risk of groundwater flooding. Shallowest observed groundwater levels over the monitoring period were in March 2022, when they were approximately 1m below indicative finished ground level in areas within the proposed WWTP.
- 2.3.12 Groundwater levels may locally rise upgradient of below-ground structures, possibly slightly exacerbating the groundwater flood risk within the excavated proposed WWTP.
- 2.3.13 The unmitigated risk of groundwater flooding to the proposed WWTP may therefore be considered **medium to high**.
- 2.3.14 The risk of emergent groundwater at ground level would be managed by the following measures;
 - Design measures i.e., gravity drainage as set out in the drainage strategy, to remove groundwater (combined with any surface water) for temporary storage within an -attenuation pond located within the land required for the landscape masterplan.
 - Continued monitoring of groundwater levels within the area of land required for the proposed WWTP and use of these data by the appointed contractor to prepare detailed design of surface water drainage and finished ground levels within the proposed WWTP.
- 2.3.15 The Drainage Strategy (Application Document Reference 5.4.20.12) is considered the most vital element of flood risk management within the proposed WWTP and, in



combination with the flood warning service and flood evacuation plan, in effect performs the role of an operational flood risk management strategy.

2.3.16 The impact of the Proposed Development on groundwater flooding elsewhere is considered in Section 4.3 of this report.

2.4 Sewer flooding

- 2.4.1 The Greater Cambridge SFRA Appendix D11 sewer flooding map (Stantec on behalf of Greater Cambridge Shared Planning, 2021), includes a list of sewer flooding incidents by postcode-<u>(Appendix B</u>Figure 10).
- 2.4.2 The proposed WWTP is located in a postcode area CB5 where a total of one sewer flooding incident has been recorded. The existing WWTP is located in postcode CB24 where there have been twelve recorded sewer flooding incidents. Pipeline and tunnel elements of the Proposed Development are distributed between postcodes CB5, CB25 and CB24.
- 2.4.3 The Proposed WWTP will be located in a greenfield setting for which there is no evidence of historic sewer flooding. The risk of sewer flooding to the Proposed Development is considered to be **low.** This risk of sewer flooding resulting from the Proposed Development is considered in Section 4.4.

2.5 Historic flooding

- 2.5.1 The Environment Agency holds records of fluvial flooding within the district. The closest recorded fluvial flooding events occurred in 1947 and 2001 in the reachreaches of the River Cam adjacent to the existing Cambridge WWTP, and were associated with exceedance of channel capacity (no raised defences) of the River Cam (Appendix B, Figure 12: Historic Fluvial Flood Outlines.). Figure 11). The proposed WWTP is outside the recorded flood extents for these events.
- 2.5.2 The Greater Cambridge SFRA Appendix 7 historic flooding map (Stantec on behalf of Greater Cambridge Shared Planning, 2021), indicates no additional reported flooding incidents from groundwater or surface water sources withing the Scheme Order Limits.



3 Residual Risk to Proposed Development

3.1 Identification of residual risk

- 3.1.1 Residual risks are those remaining after applying the sequential approach to the location of development and taking mitigating actions. Examples of residual flood risk include:
 - the failure of flood management infrastructure such as a breach of a raised flood defence, blockage of a surface water conveyance system, overtopping of an upstream storage area, or failure of a pumped drainage system;
 - failure of a reservoir, or;
 - a severe flood event that exceeds a flood management design standard, such as a flood that overtops a raised flood defence, or an intense rainfall event which the drainage system cannot cope with.
- 3.1.2 The residual risk assessed in this section is based on the risk matrix in Appendix O,A, which is based on UK Water Industry Specification guidelines (UK Water Industry, 2018).

3.2 Defence breach

- 3.2.1 The majority of the Scheme Order Limits area does not -benefit from defences' defences to a 1 in 100-year standard of protection.
- 3.2.2 The northern 1.3km of the Waterbeach pipeline will be located within an area that 'benefits from defences' to a 1 in 100 year standard of protection as shown in Appendix B Figure 5. However, the pipeline will be located below-ground and would not be at risk from fluvial flooding in the event of a breach of flood defences.
- 3.2.33.2.2 Defence breach hazard mapping from Appendix D2 of Cambridge and South Cambridgeshire SFRA (Cambridge City Council and South Cambridgeshire District Council, 2010)³, classifies the flood hazard to people in a defence breach event according to flood depth and velocity. In a 'worst case' 1 in 1000 year defence breach event, the majority of the Scheme Order Limits is located in a Very Low Hazard area (Appendix B, Figure 13: Defence breach hazard 1 in 1000 years).Figure 12). Only the pipeline and tunnel elements of the scheme<u>Proposed Development</u> which cross below the River Cam are located in Medium or High Hazard areas.
- 3.2.43.2.3 As the likelihood of a defence breach is low and the consequence to the Proposed Development is very low, the residual risk to the operational area of the Proposed Development in the event of defence-breach may be considered **very low**.

³ Defence breach modelling was not undertaken as part of the Greater Cambridge SFRA (Stantec on behalf of Greater Cambridge Shared Planning, 2021) and therefore that from the 2010 Cambridge SFRA remains the best available information.



3.3 Reservoir failure

- 3.3.1 The Environment Agency Flood Risk from Reservoir Map (Environment Agency, 2021(b)) (Appendix B, Figure 13) demonstrates the extent of an uncontrolled release of water if a dam or reservoir failed. The map shows reservoir flooding extents when river levels are within their normal range ('dry day') and also when rivers have overflowed their banks ('wet day').
- 3.3.2 Reservoirs in the UK are strictly regulated and subject to mandatory inspections (Department for Environment, Food and Rural Affairs, 2015). The Environment Agency is responsible for managing, implementing and enforcing reservoir safety regulations in England. Reservoir safety is regulated through the Reservoirs Act 1975, as amended by the Flood and Water Management Act 2010. England has an excellent reservoir safety record, and there have been no dam breaches resulting in the loss of life since reservoir safety legislation was first introduced in 1930 (Department for Environment, Food and Rural Affairs, 2015).
- 3.3.3 In a 'dry day' scenario when river levels are normal, no area of the Proposed Development would be at risk from reservoir flood waters.
- 3.3.4 In a 'wet day' scenario when river levels have overflowed their banks, the area of the River Cam between the existing and proposed WWTP may be at risk. The proposed WWTP would not be at risk in this event. The northern-most 1.3km of the Waterbeach pipeline will be located in an area that may be at risk from 'wet day' reservoir flooding. However, as the pipeline will be below ground, it would not be at risk in this event.
- 3.3.5 As the likelihood of reservoir flooding is very low and the consequence to the Proposed Development is low, even in the worst case 'wet day' scenario, the residual risk of reservoir flooding to the Proposed Development may be considered **very low**.

3.4 Drainage exceedance

- 3.4.1 In extreme rainfall events, failure or blockage of the drainage system may result in flooding within the Proposed Development. The direction of runoff flow will be topographically controlled in the event of drainage system failure.
- 3.4.2 Topographic levels from 2m LiDAR suggest that runoff from the land required for the construction of the proposed WWTP would at present be directed north-east towards Black Ditch/Quy Water.
- 3.4.3 However, the proposed WWTP will be located in an excavated area, slightly below external ground level and will be surrounded by a system of earth banks. Therefore, it is expected that runoff flow in a drainage exceedance event will be contained within the perimeter of the proposed WWTP- will be contained and managed in accordance with the Drainage Strategy (Application Document Ref 5.4.20.12). Any runoff directed away from the proposed WWTP by raised areas adjacent to the earth bank, will be controlled and attenuated by ridges and furrows within the land required for the landscape masterplan, as discussed in the Drainage Strategy



(Application Document Ref 5.4.20.12). The residual risk of drainage exceedance may therefore be considered **very low**.

3.5 IDB pumping station failure

- 3.5.1 The Proposed Development is located within the catchment boundary of Swaffam and Waterbeach Level Internal Drainage Boards.<u>IDBs.</u> The catchments are reliant on the IDBs for maintenance of surface water levels through the operation of pumping stations and management of the drainage network.
- 3.5.2 Waterbeach Level IDB operates Bottisham Lock Pumping Station, which is in the vicinity of the northern extent of the Waterbeach pipeline. In the event of pumping station failure, Waterbeach Level IDB has advised⁴ that the catchment would quickly flood. Emergency pumps would be required as soon as possible to prevent catchment flooding. Flooding due to pumping station failure at Bottisham Lock would not impact the adjacent Waterbeach pipeline, which is below-ground. Pumping station failure at Bottisham Lock is unlikely to impact the proposed WWTP, which is 4km upstream of the pumping station, and is at approximately 5m higher topographic elevation than the pumping station.
- 3.5.3 Swaffam IDB operates Upware Pumping Station, which is 5.5km north-east of the northernmost extent of the Proposed Development. Due to its distance from all elements of the Proposed Development, failure of Upware Pumping Station is considered unlikely to impact the proposed WWTP.
- 3.5.4 As the likelihood of IDB pumping station failure is low, and the consequence to the Proposed Development is very low, the residual risk of flooding from pumping station failure to the Proposed Development may be considered **very low**.

⁴ Consultation meeting 11/02/2022



4 Flood Risk from Proposed Development

4.1 Fluvial flooding

Modelled scenarios

- 4.1.1 The Proposed Development will discharge treated effluent (final effluent plus stormwater discharge) to the River Cam. Fluvial modelling has been undertaken (Application Document ReferenceRef 5.4.20.5): Fluvial model report) to determine the impact of the proposed outfall to fluvial flood risk downstream on the River Cam. ModelledThis assessment considers the modelled design flood outlines (Appendix B Figure 15) demonstrate that the land requiredcondition of a 55-hour duration critical storm for the construction of the proposed WWTP would not be at risk in any fluvial flood eventRiver Cam⁵. It further considers impacts to third party receptors as obtained from the 1 in 2 year to the 1 in 1000 year event, inclusive of treated effluent discharge from the proposed WWTP. Flood outlines inclusive of treated effluent from the proposed outfall (Appendix B Figure 15) are almost identical to those which include treated effluent from the existing outfall (Appendix B Figure 7).Ordnance Survey (Ordnance Survey, 2021).
- 4.1.2 The fluvial flood model results reported in the Fluvial Model Report (Application Document Referce 5.4.20.5) indicate a 4mm (0.004m) increase in stage level at Baits Bite Lock (approximately 500m downstream of the proposed outfall) for a 61 hour storm in the 1%AEP event. In a 1%AEP + 20%CC event, the stage level rise would be 7mm (0.007m). At other node locations for this event, the increases are even smaller. The water level convergence tolerance for the model was 10mm and therefore changes in water level of less than 10mm are not considered significant.
- <u>4.1.2</u> The fluvial flood model outputs reported Various modelling scenarios have been run in order to decouple flood risk which may be due solely to the proposed WWTP, from flood risk due to increased treated effluent discharge resulting from predicted population growth to the year 2041. The modelled scenarios are shown in Table <u>4-1Table 4-141.</u>
- <u>4.1.3</u> All modelled scenarios include climate change allowances for the 2080s epoch (Table
 2-2), based on the designed capacity of the proposed WWTP to at least 2090. As
 <u>described in Document Ref 5.2.2</u>: Chapter 2: Project Description, the final effluent
 <u>discharge consent application to the Environment Agency is designed to address</u>
 <u>predicted population growth in two phases;</u>
 - Phase 1 of the proposed WWTP assumes a population equivalent of 275,000 to meet growth predicted in the emerging Greater Cambridge Local Plan to the mid-2030s.

⁵ Sensitivity testing for a 4-hour critical storm is also considered in the fluvial modelling report (Application Document Ref 5.4.20.5)



- Phase 2 of the proposed WWTP assumes a population equivalent of 300,000, which is consistent with the Greater Cambridge Local Development growth forecast to 2041.
- 4.1.4 This assessment considers Phase 2 of the proposed WWTP, which provides the more conservative case of final effluent discharge⁶. It should be noted that climate change allowances for the 2080s epoch (Table 2-2), applied in the modelled scenarios, may be considered conservative with respect to Phase 2 of the Proposed Development, which assumes a growth forecast to the year 2041. Modelled scenarios are shown in Table 4-1Table 4-141.
- 4.1.5Two of the modelled scenarios in Table 4-1Table 4-141 consider a 'future baseline'
condition for the year 2041. Phase 2 of the final effluent discharge application for
the proposed WWTP supports expected population growth to the year 2041. As an
alternative option, the existing Cambridge WWTP would require investment and
adaption to support expected population growth to the year 2041. Both future
baseline scenarios assume treated effluent quantities in line with population growth
forecast for 2041.

Table 4-1:	Modelled	scenarios

<u>Scenario</u>	Description
<u>Baseline – existing</u> <u>Cambridge WWTP</u>	Existing Cambridge WWTP location and existing outfall. Treated effluent discharge volume reflective of current population.
<u>Future baseline –</u> <u>existing Cambridge</u> <u>WWTP</u>	Existing Cambridge WWTP location and existing outfall. Treated effluent discharge volume reflective of population growth forecast to the year 2041.
<u>Future baseline –</u> proposed WWTP	Proposed WWTP and proposed outfall. Treated effluent discharge volume reflective of population growth forecast to the year 2041.

- <u>4.1.6</u> Any change in flood risk solely due to the proposed WWTP, can be determined by comparing future baseline scenarios i.e. 'Future baseline proposed WWTP' and 'Future baseline existing Cambridge WWTP'. Both scenarios are based on a population assumption for the year 2041. Any increase in flood risk solely due to the proposed WWTP would require mitigation.
- <u>4.1.7</u> Any change in flood risk solely due to predicted population growth from the current population to the year 2041, is determined by comparing scenarios 'Future baseline – existing Cambridge WWTP' and 'Baseline - existing Cambridge WWTP'. These scenarios compare the impact of population growth on treated effluent discharges for the existing Cambridge WWTP.

⁶ Sensitivity testing for Phase 1 is further considered in the fluvial modelling report (Application Document Ref 5.4.20.5)



- 4.1.8Figures in Appendix B include 'modelling results discussion points' for simplicity of
reference in the following sections. These points are indicative of areas which may
include third party receptors, where notable changes in flood depths or extents
occur between modelled scenarios.
- 4.1.9 The assessment of flood risk to third party receptors includes consideration of modelled events up to and including the Upper end climate change allowance i.e. 1 in 2 year, 1 in 10 year, 1 in 20 year, 1 in 30 year, 1 in 75 year, 1 in 100 year, 1 in 100 year plus 9% CC, 1 in 100 year plus 19% CC, and 1 in 100 year plus 45% CC. Spatially, the assessment considers all downstream third party receptors within modelled flood extents, as far as the confluence of the River Great Ouse, which is approximately 14km downstream of the proposed WWTP.
- 4.1.10 Flood hazards are considered where applicable for residential properties. The flood hazard to people classification scheme (Defra/Environment Agency, 2006) designates a hazard rating according to a combination of factors, including flood depth and velocity.
- 4.1.11 As the convergence tolerance of model simulations is 0.01m, increases of flood depths less than 0.01m are considered negligible, and those greater than 0.01m are considered notable.

Modelling assumptions

- <u>4.1.12 As described</u> in the Fluvial Model Report (Application Document <u>Ref</u> 5.4.20.5) indicate stage level increases of up to 22mm (0.022m) at Baits Bite Lock), the following conservative assumptions have been used in modelling;
 - The sewer model for lower magnitudeboth future baselines (Future baseline - existing Cambridge WWTP and Future baseline – proposed WWTP), includes a 5m² allowance per property for uncontrolled runoff entering the sewer network for all new development.
 - Discharge flows for all scenarios, including the 'Baseline existing Cambridge WWTP' scenario, have been explicitly added to the model, and there is therefore an element of double-counting, as these flows are already represented within the Cam Urban Model (JBA, 2023).

In-channel water levels

- 4.1.13 The Fluvial Model Report (Application Document Ref 5.4.20.5) shows that in all
modelled events (e.g. for the 55-hour critical storm, changes in River Cam water
levels resulting from the Proposed Development, inclusive of expected population
growth to the year 2041, would be of the order of millimetres. For example, for the 1
in 100 year plus 9% climate change event, the maximum predicted increase in peak
in-channel water levels is 0.002m (2mm).
- 4.1.34.1.14 The greatest change in water levels within the River Cam occurs for the 1 in 2 year event). This is due to the WWTP discharge making up a larger proportion of the



total River Cam flow in lower magnitude events. In the 1 in 2 year event, the stage level would not exceed the normal retention level (3.88mAOD) at Baits Bite LockProposed Development, inclusive of population growth to the year 2041, may increase water levels at Baits Bite Lock by less than 0.007m (from 3.911mAOD to 3.918mAOD) compared to the existing Cambridge WWTP. The normal retention level of Baits Bite Lock is approximately 3.85mAOD.

- 4.1.4 The impact convergence tolerance of model simulations is 0.01m, as discussed in the treated effluent on flood risk-Fluvial Model Report (Application Document Ref 5.4.20.5). Modelled increases of water level within the River Cam mayare therefore be considered negligible.
- 4.1.5<u>4.1.15</u> The finished platform level generally far less than the tolerance of the proposed outfall will match the existing bank height and therefore will have a negligible impact on flood risk.model.
- 4.1.6 Above ground development within the proposed WWTP will be located entirely within Flood Zone 1 and therefore would not impact fluvial flood risk elsewhere.
- 4.1.7 The Proposed Development would therefore have a **very low** impact on fluvial flood risk elsewhere
- 4.1.16 Although the predicted water level increases within the River Cam, resulting from the Proposed Development, are extremely small, larger changes can occur in the flood plain as a result of the slightly increased flood volume. Changes in the flood plain are discussed in the following sections.

Impact due to relocation of WWTP

- 4.1.17 Modelled flood extents for the proposed WWTP (Appendix B, Figure 14Figure 1414) demonstrate that the land required for the construction of the proposed WWTP would not be at risk in any of the fluvial flood events assessed, inclusive of the 1 in 100 year (1%) with climate change (Appendix B, Figure 15). Therefore, development within the proposed WWTP would not increase fluvial flood risk elsewhere. In addition, the 'Water compatible' infrastructure (outfall and below-ground pipelines and tunnel) associated with the Proposed Development would not be expected to increase fluvial flood risk elsewhere.
- 4.1.18 Fluvial flood risk related only to treated effluent from the proposed WWTP is
 assessed by comparing future baseline scenarios i.e. 'Future baseline proposed'
 (Appendix B Figure 14Figure 1414) and 'Future baseline existing' (Appendix B
 Figure 16Figure 1616), as defined in Table 4-1Table 4-141. These scenarios assume
 the same (year 2041) population and therefore any flood risk impacts resulting from
 the location and discharge infrastructure of the proposed WWTP can be considered
 alone, decoupled from flood risk due to population growth.
- 4.1.19 As discussed in Section 2.1, the Central peak river flow climate change allowance of9% is applicable to the Proposed Development. For the 1 in 100 year plus 9% climatechange event, the differences in flood extents are generally negligible whencomparing both future baseline scenarios (Appendix B, Figure 15, Figure 17Figure



<u>1717</u>). For this event, impacts are observed only at Areas O and L (Appendix B, Figure 7, Figure 16) where there are increases in flood depth of typically 0.03m in an agricultural field. However, the field just north of Area L is already predicted to flood in the 'Future baseline – existing' scenario up to depths of 0.26m. There are also slight flood depth increases of 0.01m in an agricultural field at Area O (Appendix B, Figure 7, Figure 16) but this area is expected to flood in the 'Future baseline – existing' scenario at depths of 0.23m .

- 4.1.20 For all other modelled events (1 in 2 year, 1 in 10 year, 1 in 20 year, 1 in 30 year, 1 in 75 year, 1 in 100 year, 1 in 100 year plus 19% CC, 1 in 100 year plus 45% CC, 1 in 200 year, and 1 in 1000 year) flood extent and flood depth differences are also negligible when comparing both future baseline scenarios, as shown in the fluvial modelling report (Application Document Ref 5.4.20.5).
- 4.1.21 In summary, the location and discharge infrastructure of the proposed WWTP would
have a negligible impact on fluvial flood risk compared to the existing WWTP, when
the same (2041) population assumption is applied to both models. No mitigation is
required.

Impact due to population growth

- 4.1.22 In this section, flood risk impacts solely due to population growth are assessed by comparing scenarios 'Baseline – existing Cambridge WWTP' and 'Future baseline – existing Cambridge WWTP' (Table 4-1Table 4-1). These scenarios compare flows inclusive of treated effluent from the existing Cambridge WWTP in the present day, with those for the existing Cambridge WWTP with consideration for population growth to the year 2041.
- <u>4.1.23</u> Flood extents for 'Future baseline existing Cambridge WWTP' (Appendix B, Figure <u>16Figure 1616</u> and Figure 17Figure <u>1717</u>) are generally very similar to 'Baseline – <u>existing Cambridge WWTP' (Appendix B, Figure 7 and Figure 8) with only slight</u> increases to flood extents in certain places as discussed below.

Railway Track

- 4.1.24 Flood Zone 3 rural areas A, B, C, D and E (Appendix B, Figure 7 and Figure 16Figure 16Figur
 - In the 1 in 10 year event, flood depths in Area C may increase by up to 0.03m, from typically 0.22m to 0.25m. In Area D, flood depths increase slightly by 0.01m.
 - In the 1 in 20 year event, Area B has a slight increase in flood extent. Flood depths may increase by up to approximately 0.10m but more typically 0.04m, from approximately 0.11m to 0.15m. There are also flood depth increases in Area A of 0.03m.



- In the 1 in 30 year event, Area B is affected, with maximum increases in flood depth of up to 0.02m, from up to approximately 0.54m to 0.56m. Additionally, flood depths in Area A may increase by up to 0.01m in this event, from typically 0.20m to 0.21m.
- In the 1 in 50 year event, only Area E may be affected, with typical flood depth increases of 0.04m, from 0.52m to 0.56m.
- There would be negligible impact in Areas A, B, C, D and E in higher return periods. Flood hazard classification would remain unchanged at areas A, C, D,
 E. In Area B, the slightly increased flood extents would increase the area at within 'Low Hazard' classification.
- 4.1.25 Areas A, B, C, D, and E are located in Flood Zone 3 and each have a history of flooding (Appendix B, Figure 11). No sensitive receptors would be impacted in these events. It is also observed that for higher return periods, including climate change, there are negligible differences in flood levels between the existing 'Baseline – existing Cambridge WWTP' and proposed 'Future baseline - existing Cambridge WWTP' scenarios adjacent to the stretch of railway between Milton and Waterbeach in areas A, B, C, D and E.

Cambridge Motor Boat Club

4.1.26 To the east of Waterbeach railway station the Cambridge Motor Boat Club (Area F) is predicted to be at risk in the 1 in 10 year event in both the 'Baseline – existing Cambridge WWTP' and 'Future baseline - existing Cambridge WWTP' scenarios. It is predicted that this location may see an increase in flood depths of up to approximately 0.10m in 'Future baseline - existing Cambridge WWTP' scenarios, with flood depths in Area F increasing from typically from 0.10m in the 'Baseline – existing Cambridge WWTP' scenario to 0.20m in the 'Future baseline – existing Cambridge WWTP' scenario, however flood hazard classification would not change. There is no change in predicted flood risk for higher return periods.

Bannold Road

- 4.1.27 To the east of Waterbeach, in the vicinity of Bannold Road, there are predicted flood depth differences between the 'Baseline – existing Cambridge WWTP' and 'Future baseline - existing Cambridge WWTP' scenarios, for the 1 in 75 year event, 1 in 100 year event and 1 in 100 year plus 45% CC event only. Residential receptors are present in this area (Areas G, H, I and J as shown in Appendix B, Figure 7 and Figure 16Figure 1616), which is in Flood Zone 3. Area G consists of three properties to the north of Bannold Road, Area H consists of three properties south of Bannold Road, accessed via Fen Rivers Way, Area I consists of a property on Burgess's Drove (just south of Bannold Road) and Area J consists of two properties on Bannold Drove, part of Bannold Road, and agricultural fields south of Bannold Road. These areas are discussed in the following points:
 - In the 1 in 75 year event only, an increase in flood extents may affect Fen Rivers Way, potentially impacting access of two properties south of Bannold Road (Area H as shown in Appendix B, Figure 7 and Figure 16Figure 1616),



which are located in Flood Zone 3. Flood depths within the eastern end of Bannold Drain could be up to 1.47m in the 'Future baseline - existing Cambridge WWTP' for this event, which is an increase of typically 0.05m compared to the existing scenario. The receptors in Area H remain within the 'Low Hazard' band. There are also flood depth increases in Area I (shown in Appendix B, Figure 7 and Figure 16), also in Flood Zone 3. This includes the boundary⁷ of a property where flood depth increases are approximately 0.05m. This receptor remains within the 'Low Hazard' band. Flooding from Bannold Drain may extend up to 500m south of Bannold Drain in the 'Future baseline - existing Cambridge WWTP' scenario, with flood depths ranging from approximately 0.30m to 0.60m in areas of low topographic elevation, increasing typically by 0.05m in the 1 in 75 year flood event.

- In the 1 in 100 year event, residential receptors located in Flood Zone 3 south of Bannold Road (Areas H and I as shown in Appendix B, Figure 7 and Figure 16Figure 1616) may flood in both 'Baseline – existing Cambridge WWTP' and 'Future baseline - existing Cambridge WWTP' scenarios. Flood depths would increase by approximately 0.01m, with predicted depths ranging between 0.60m to 1.01m in the 'Future baseline - existing Cambridge WWTP' scenario. The flood hazard classification at these receptors is 'Significant Hazard' in the 'Baseline – existing Cambridge WWTP' scenario for this event, and would remain a 'Significant Hazard' in the 'Future baseline - existing Cambridge WWTP' scenario (Appendix B Figure 18Figure 1818 and Figure 19Figure 1919). Flood depth differences for higher order events (1 in 100 year plus 9%CC, 1 in 100 year plus 19%CC, 1 in 100 year plus 45%CC) in Areas H and I are negligible.
- In the 100 year event, two residential receptors north of Bannold Road (Area G as shown in Appendix B, Figure 7 and Figure 16Figure 1616), located in Flood Zone 3, may flood in both 'Baseline – existing Cambridge WWTP' and 'Future baseline - existing Cambridge WWTP' scenarios. Flood depths at these receptors typically increase by 0.09m in this event, with a maximum increase of 0.11m in areas of low topographic elevation. The flood hazard classification at the receptors is a 'Low Hazard' for both scenarios for this event (Appendix B, Figure 18Figure 1818 and Figure 19Figure 1919). The areas of low topographic elevation between the receptors, exhibit variability in flood hazard classification, ranging between 'Low', 'Moderate' and 'Significant' in both scenarios, but with increased 'Significant' flood hazard extents in the 'Future baseline - existing Cambridge WWTP' scenario, as shown in Appendix B, Figure 18Figure 1818 and Figure 19Figure 1919.
- For the 1 in 100 year plus 45%CC (Appendix B, Figure 8 and Figure 17), Area J (as shown in Appendix B, Figure 7 and Figure 16) is affected. This area includes the boundary of two properties on Bannold Drove and crosses over a

⁷ Property boundary is considered to include driveways, gardens and outbuildings as observed on Google Satellite (Imagery@2023 Airbus, CNES/Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, Ther Geoinformation Group, 2023)



section of Bannold Road which could affect access to properties in Areas G, H, I and J. Flood depths across this area typically increase by 0.01m, with depths ranging from approximately 0.90m to 1.30m in the 'Future baseline - existing Cambridge WWTP' scenario.

- For the 1 in 100 year plus 9%CC and 1 in 100 year plus 19%CC (Appendix B, Figure 8 and Figure 17) there are negligible differences in flood extents or flood levels at, and within the boundary of, residential receptors in the vicinity of Bannold Road between the 'Baseline – existing Cambridge WWTP' and 'Future baseline - existing Cambridge WWTP' scenarios.
- 4.1.28 Impacts to residential receptors at Bannold Road within Flood Zone 3, resulting from population growth to the year 2041, are conservatively considered moderate in accordance with magnitude of impact criteria in Chapter 20 Water Resources (Application reference 5.2.20, AS-040). Access to residences may be impacted and flood depths may increase slightly, although flood hazard classification would not change at these residences.

Cam Washes SSSI

- 4.1.29 Three to eight kilometres downstream of the Proposed Development, in the floodplains adjacent to Cam Washes SSSI, Flood Zone 3 rural areas (Areas K, L, M, N, O, P and Q, Appendix B, Figure 7, Figure 16) of agricultural land and third party receptors may be affected in the 'Future baseline - existing Cambridge WWTP' scenario compared to the 'Baseline – existing Cambridge WWTP'. This includes an inprogress residential development (at Area N shown in Appendix B, Figure 7, Figure 16) consisting of six proposed properties on Dimmock's Cote Road. Modelled flood depths are based on pre-development topographic assumptions. Site level changes due to the development will not be represented in the flood model and therefore the differences shown are indicative.
 - In the 1 in 2 year event (Appendix B, Figure 7, Figure 16Figure 1616), flood depths typically increase by 0.01m at the Fish and Duck Marina, and Fish and Duck public house (Area Q) up to a flood depth of approximately 1.41m at the public house in the 'Future baseline - existing Cambridge WWTP'.
 - In the 1 in 50 year event (Appendix B, Figure 7, Figure 16Figure 1616), flood depths typically increase by 0.02m in agricultural fields next to Cam Washes (Area P) up to typical flood depths of 0.30m in the 'Future baseline – existing Cambridge WWTP' scenario. In the field just south of Area point P, there are increased flood extents with maximum flood depths of 0.20m in the 'Future baseline – existing Cambridge WWTP' scenario.
 - In the 1 in 75 year event (Appendix B, Figure 7, Figure 16Figure 1616), flood depths typically increase by 0.02m in agricultural fields next to Cam Washes (Area P). This increased flood depth covers agricultural fields spanning from just south of Area Q to Area N. Flood depths within the vicinity of an inprogress residential development off Dimmock's Cote Road (Area N) may increase by up to 0.02m with flood depths in the 'Future baseline – existing



Cambridge WWTP' ranging from 0.05m to 1.2m. Road access would not be affected in this event. There may be a very localised area of flood depth increase of 0.03m within the vicinity of a pond at a residential property at Upware Road (Area M).

- In the 1 in 100 year event (Appendix B, Figure 7, Figure 16Figure 1616), flood depths within the vicinity of an in-progress residential development off Dimmock's Cote Road (Area N) typically increase by up to 0.02m with flood depths in the 'Future baseline – existing Cambridge WWTP' ranging from 0.10m to 1.50m. In Area P, and the surrounding agricultural fields next to Cam Washes, flood depths typically increase by 0.02m with flood depths in the 'Future baseline – existing Cambridge WWTP' typically around 1.00m.
- In the 1 in 100 year plus 9%CC event, flood extents may increase in Area L and Area O (Appendix B, Figure 20Figure 2020). In the agricultural fields spanning 3km southwest of the Modelling Discussion point for Area L, flood depths typically increase by 0.01m from 0.34m to 0.35m. In areas of lower topography in the two fields adjacent to Area L, there are maximum flood depth increases of 0.24m up to a flood depth of 0.44m in the 'Future baseline - existing Cambridge WWTP' scenario. (Appendix B, Figure 7, Figure 16Figure <u>1616</u>). In the agricultural land at Area O, flood extents may increase, and flood depths typically increase by 0.10m with maximum increases of up to 0.18m. No residential receptors are present in these areas. At Dimmock's Cote Road (Area N), there may be a localised increase of flood extent which may affect the access road only, with a maximum flood depth of 0.27m.
- In the 1 in 100 plus 19%CC, flood depths typically increase by 0.01m in agricultural land from Modelling Discussion point O to approximately 2.2km southwest of Area O. Flood depth in this area range from 0.19m to 0.74m in the 'Future baseline - existing Cambridge WWTP' scenario.
- 1 in 100 plus 45%CC, flood depths at a residential property and farm on Long Drove (Area K) may increase by 0.01m. Flood depths at this receptor in the 'Baseline – existing Cambridge WWTP' scenario are expected to be typically 0.28m. In the field adjacent to the property, there are increased flood extents. Flood depths increase by up to 0.15m.
- 4.1.30 At Areas K, M, N, O, P, Q and R there is no change in flood hazard classification when comparing 'Future baseline – existing Cambridge WWTP' to the 'Baseline – existing Cambridge WWTP' scenario. The slight increase in flood extents in Area L would increase the area within 'Low Hazard' and 'Medium Hazard' classification.
- 4.1.31 Impacts to Flood Zone 3 agricultural receptors at Cam Washes resulting from population growth to the year 2041, are considered minor in accordance with magnitude of impact criteria in Chapter 20 Water Resources (Application reference 5.2.20, AS-040). Flood depth increases in agricultural land which already flood in the 'Baseline – existing Cambridge WWTP' scenario, is considered a minor impact to users (farmers). Impacts to residential receptors at Bannold Road in Flood Zone 3 resulting from population growth to the year 2041, are conservatively considered



moderate in accordance with magnitude of impact criteria in Chapter 20 Water Resources (Application reference 5.2.20, AS-040). Access to residences may be impacted and flood depths may increase slightly.

Analysis of population growth impacts

- 4.1.32 In this section, flood risk solely due to population growth to the year 2041 has been assessed by comparing 'Baseline – existing Cambridge WWTP' and 'Future baseline – existing Cambridge WWTP' scenarios. Population growth to the year 2041 is considered generally to have a **negligible** impact on fluvial flood risk elsewhere. Exceptions include agricultural land between Milton and Waterbeach and at Cam Washes SSSI, residential properties at Bannold Road, Long Drove and Dimmock's Cote Road, and marinas at Cambridge Motor Boat Club and the Fish and Duck Marina.
- 4.1.33 However, this assessment is considered highly conservative for the following reasons;
 - The sewer model for both future baselines (Future baseline existing Cambridge WWTP and Future baseline – proposed WWTP), includes a 5m² allowance per property for uncontrolled runoff entering the sewer network for all new development. This is conservative because new development is generally expected to reduce runoff to greenfield rates;
 - Discharge flows for all scenarios, including the 'Baseline existing Cambridge WWTP' scenario, have been explicitly added to the model, and there is therefore an element of double-counting, as these flows are already represented within the Cam Urban Model (JBA, 2023);
 - Climate change allowances for the 2080s epoch (Table 2-2), applied in the modelled scenarios, may be considered conservative with respect to Phase 2 of the Proposed Development, which assumes a growth forecast to the year 2041;
 - Existing flood mitigation measures are not considered. At Bannold Road, these may include river stage level control measures at Bottisham Lock and Sluice, and any IDB drainage control measures of Bannold Drain, provided by the adjacent Bottisham Lock Pumping Station. There is no Environment Agency record of historic flooding at Bannold Road (Appendix B, Figure 11); and
 - In terms of both location and severity, there is inconsistency in modelled population growth impacts on third-party receptors across different modelled flood events. This combined with conservative modelling assumptions, introduces uncertainty regarding whether there is a genuine impact. The pathway to securing mitigations to address these uncertain impacts is discussed in Appendix C.



4.2 Surface water flooding

- 4.2.1 The proposed WWTP will be located in an excavated area, slightly below external ground level, and will be surrounded by a system of earth banks. Therefore, it is expected that surface water runoff will be contained within the perimeter of the proposed WWTP, where it will be managed by the Drainage Strategy (Application Document Ref 5.4.20.12).
- 4.2.2 The drainage strategy includes dedicated drainage for areas of the proposed WWTP which present a contamination risk. Potentially contaminated surface water runoff will be returned to the head of the works for treatment.
- 4.2.3 Runoff from uncontaminated areas will be directed to an attenuation pond located within the land required for the landscape masterplan. Outflow from the pond will be restricted to greenfield runoff rate and discharged to a drain linked to Black Ditch.
- 4.2.4 The Proposed Development is therefore unlikely to increase surface water flood risk elsewhere. The impact of the Proposed Development to surface water flood risk elsewhere is considered **very low**.

4.3 Groundwater flooding

- 4.3.1 The Proposed Development includes deep below-ground foundations, shafts and tunnels which may impact groundwater flows and levels. These deep structures may intercept groundwater within the Gault Formation and West Melbury Marly Chalk Formation.
- 4.3.2 Groundwater levels may locally rise upgradient of below-ground structures, potentially increasing groundwater flood risk to the proposed WWTP (as discussed in Section 2.3). However, groundwater is expected to flow around these structures and the impact at aquifer scale is considered negligible.
- 4.3.3 The risk of groundwater flooding elsewhere as a result of the Proposed Development is therefore considered **low**.

4.4 Sewer flooding

- 4.4.1 The Proposed Development includes provision for population growth and includes improved storm water management as indicated within the Storm Model Report (Application Document Ref 5.4.20.10). This will reduce the likelihood of storm spills in the future compared to the existing situation.
- 4.4.2 Mitigation measures in operation are embedded through design in accordance with National Policy Statement for Waste Water (Department for Environment, Food & Rural Affairs, 2012) allowing future flexibility and the ability to adapt. Environmental management plans and regulatory permits will govern operational use.
- 4.4.3 The risk of sewer flooding from the Proposed Development is considered **low**.



5 Flood Risk ind During construction Construction

5.1 Flood risk from construction

Cofferdam

- 5.1.1 The outfall and rip-rap riverbed protection will be built within a sheet pile cofferdam, to provide dry conditions for construction. The cofferdam will be designed to maintain the flood protection levels currently provided by the river bank.
- 5.1.2 The cofferdam will temporarily reduce the cross-sectional area of the river, which may cause an increase in water levels and/or an increase in water velocity within the zone where the constriction occurs. There may be a backwater impact due to an increase in water levels (mounding) slightly upstream of the constriction.
- 5.1.3 The cofferdam is expected to be approximately 35m long and will extend up to 5m into the river. The River Cam is approximately 24m wide at the location of the proposed outfall and therefore the cofferdam may reduce the river width by 21%.
- 5.1.4 It is anticipated that the cofferdam will be constructed during a dry time of year (e.g., summer/autumn months) when stage levels are not above average. The cofferdam is expected to be constructed in two sections: a land section and a river section. The river section of the cofferdam will be in place for a limited period of approximately eight weeks, to minimise river constriction impacts. Construction behind the land section of the cofferdam is expected to take up to four months.
- 5.1.5 Changes in water level and velocity as a result of the cofferdam are likely to dissipate downstream and are expected to be eliminated at Baits Bite Lock.
- 5.1.6 The river section of the cofferdam may locally affect flows and levels of the River Cam. However, as the river section of the cofferdam will be in place during a dry time of year and for a short period of time, the impact to flood risk elsewhere is considered **low**. However, in a fluvial flood event, the cofferdam will increase flood risk.

FEFinal Effluent and storm pipelines

5.1.7 Excavation work for Final Effluent (FE) and storm pipelines to the outfall is not expected to significantly impact flood risk elsewhere, assuming that mitigation measures and best practice will be applied prior to and during construction to protect hydrological receptors as outlined in the Code of Construction Plan (CoCP) Part A and B (Application Document Reference 5.2.2.1 and 5.2.2.2). and implemented in the Construction Water Quality Plan and the Construction Environmental Management Plan (CEMP).



Waterbeach pipeline

- 5.1.8 The Waterbeach pipeline will be installed below the River Cam at two crossing points and will be constructed using directional drilling techniques to a depth of 5.5m below the river bed. <u>During construction</u>, there would be negligible construction or disturbance to water levels, flows or flood defences within the River Cam using these techniques.
- 5.1.9 Numerous ditches and drains are present within the vicinity of the Proposed Development, which are managed by Swaffam and Waterbeach Level IDBs (see maps in Appendix 0). The ditches convey surface water through the IDB drainage networknetworks.
- 5.1.10 During construction, shallow ditches along the route of the Waterbeach pipeline, will be blocked and over-pumped during excavation and laying of the pipe-section. The pipe sections will be installed below the base of the ditch-and once the pipe section has been laid, ditches will be reinstated promptly.
- 5.1.11 Micro-tunnelling techniques will be used on larger ditches to install the pipelines below the base of the <u>ditchditches</u>. There will be little disturbance to water levels or flows within ditches using this technique.
- 5.1.12 The northern extent of the Waterbeach pipeline to the area just south of the crossing of the Cam is within Flood Zones 2 and 3 (see Figure 5). Laydown areas will be required along the route approximately every 1km used to store sections of the pipeline whilst the construction takes place. Each laydown area is expected to be a maximum of 20m x 80m. As a reasonable worst-case scenario, it has been assumed that each will require the topsoil to be stripped, a barrier laid (i.e. terram) and the area covered with temporary hardstanding. The hardstanding will be removed, and the topsoil reinstated when the use of the laydown area ceases. Due to the limited size of the hardstanding areas and their temporary nature, the impact to fluvial and surface water flood risk elsewhere is considered very low.

Transfer tunnel

5.1.13 The transfer tunnel will cross below the River Cam between the existing and proposed WWTP and will be constructed in sections using a pipe-jacking technique. The crown of the tunnel will be at least 10m below the riverbed. <u>During construction</u>, there will be negligible construction or disturbance to water levels, flows or flood defences within the River Cam using these techniques.

Dewatering discharge

- 5.1.14 Dewatering may be required during construction of shafts, pipelines and the outfall.
- 5.1.15 Dewatering discharge rates and locations of discharge points will be agreed with the Environment Agency or other relevant body as required.
- 5.1.16 <u>As outlined in the Code of Construction Practice (CoCP) Part A (Doc 5.4.2.1)</u>, a Construction Water Quality Management Plan will be prepared, which sets out



requirements to protect watercourses from sediment release during dewatering activities.

5.2 Flood risk to construction

Outfall construction

5.2.1 The outfall will be built within a sheet pile cofferdam to provide dry conditions for construction. The cofferdam will be designed to maintain the flood protection levels currently provided by the river bank, and is expected to include a freeboard of approximately 1m to prevent overtopping in a higher magnitude flood event.

Transfer tunnel and intermediate shafts

- 5.2.2 The transfer tunnel crosses below the River Cam between the existing Cambridge WWTP and proposed WWTP and will be constructed in sections using a pipe-jacking technique.
- 5.2.3 The transfer tunnel would only be affected by flooding if an intermediate shaft floods. All six intermediate shafts for the tunnel will be located within Flood Zone 1 and therefore the risk of fluvial flooding is **very low**.

5.3 Flood risk during commissioning and decommissioning

- 5.3.1 During the wet commissioning period for the proposed WWTP, which is expected to be of approximately 6 months duration, final effluent will be gradually transferred from the existing WWTP to the proposed WWTP. There will be a gradual reduction in final effluent discharge from the existing WWTP outfall and a corresponding increase in discharge from the proposed WWTP outfall. As the same quanta of discharge will in effect gradually change from the existing outfall to the proposed outfall over the commissioning period, the impact to flood risk over the commissioning period is considered negligible.
- 5.3.2 Discharge from the existing outfall will eventually cease entirely, as part of the decommissioning of the existing WWTP. Flow in the approximately 90m reach of the river between the existing and proposed outfall will be impacted (reduced) by the reduction in discharge from the existing WWTP outfall, thereby reducing fluvial flood risk over this reach. The reduction in flow over the 90m reach of river between the existing and proposed outfall is considered not of significance at WFD waterbody scale as reported within the Water Framework Directive Assessment Report (Application Document Ref 5.4.20.3).
- 5.3.3 Flood risk relating to discharges from the proposed outfall are discussed in Section 4.1 Fluvial flooding.



6 Flood Risk <u>Mmanagement Mm</u>easures

6.1 **Permits and policies**

- 6.1.1 The proposed WWTP will be sequentially located in Flood Zone 1.
- 6.1.2 Elements of the Proposed Development which cross, or are adjacent to the River Cam, are located either wholly or partially within Environment Agency Flood Zones 2 and 3. These include the outfall, Final Effluent (FE) and storm pipelines, Waterbeach pipeline, and the transfer tunnel.
- 6.1.3 Any development within 8m of an Environment Agency main river may require an Environment Permit (Flood Risk Activities) from the Environment Agency.
- 6.1.4 Pipeline and tunnel crossings below flood defences of the River Cam may require an Environment Agency Flood Risk Activity Permit for works involving temporary or permanent structure in, over or under a main river, dredging/ removing any material from a main river, any activity within 8 metres of the bank of a main river or any activity within 8 metres of any flood defence structure or culvert on a main river.
- 6.1.5 Internal Drainage Board (IDB) consent will be required for all activity in, under, or within 9m of IDB managed watercourses.
- 6.1.6 An Environment Agency Permit to Pump (Water Discharge Activity Permit) will be required for dewatering discharge to watercourses that do not meet the criteria of the Environment Agency Regulatory Position Statement (RPS) 261 'Temporary dewatering from excavations to surface water' (Environment Agency, 2023).
- 6.1.7 The National Policy Statement for Waste Water (Department for Environment, Food & Rural Affairs, 2012) requires flood resilience measures within flood risk areas (Paragraph 4.4.10), and for the drainage system to comply with the Flood and Water Management Act (2010), with priority given to SuDS (Paragraph 4.4.11)).
- <u>6.1.8</u> Updated flood risk planning practice guidance (Department for Levelling Up, Housing and Communities, 2022)_reinforces the policy position on flood risk introduced in the updates to the NPPF in 2018 and 2021. This includes guidance relating to new development reducing the causes and impacts of flooding, through the use of natural flood management techniques wherever they would be effective (Paragraph: 062 Reference ID: 7-062-20220825).
- 6.1.86.1.9 The landscape masterplan within the Landscape Ecology and Recreation Management Plan (LERMP)(Application Document Reference 5.4.8.14) and the Drainage Strategy (Application Document Reference 5.4.20.12) collective include provision for an integrated solution to surface water management including green infrastructure features for the management of surface water. Flood risk and coastal change sections of Planning Practice Guidance (Department for Levelling Up, Housing and Communities, 2022) covers flood resistance and flood resilience particularly in relation to development within the flood plain. The proposed WWTP will be located in Flood Zone 1. Below-ground pipelines and tunnel elements of the



Proposed Development located in Flood Zones 2 and 3 are flood resilient, remaining operational during flood conditions and would have a negligible impact on floodplain storage, surface water flows or flood risk elsewhere.

6.2 Flood warning service

- 6.2.1 The Environment Agency operate a free 24-hour Flood Alert and Warning service (GOV.UK, 2022). Flood warnings are sent by email, text or phone call for:
 - current flood warnings or alerts
 - river, sea, groundwater and rainfall levels
 - flood risk in the next 5 days
- 6.2.2 Elements of the Proposed Development which cross the River Cam are located with an Environment Agency Flood Alert area for 'Lower River Cam in Cambridgeshire'. The land required for the bridleway extension is located within an Environment Agency Flood Alert area for 'Ely Ouse in Cambridgeshire, Suffolk and Norfolk'. The CoCP Part A and B (Application Document Ref 5.4.2.1 & 2) will require Site Managers to subscribe to the Environment Agency Flood Alert service. Maintenance of infrastructure in, or adjacent to, Flood Zones 2 and 3 should be avoided if a Flood Alert or Warning is in place. Construction flood risk is further considered in Section 6.4.

6.3 Flood evacuation plan

- 6.3.1 The proposed WWTP is located in Flood Zone 1 and safe refuge will be available on site in a flood event.
- 6.3.2 Should staff and visitors leave the safe refuge of the proposed WWTP during a flood event, flooding may have already occurred in adjacent watercourses such as the River Cam or Quy Water. If flooding has commenced and flood depths along roads or public footpaths/bridleways exceed 25cm, staff and visitors are advised to remain on site, or seek refuge within adjacent Flood Zone 1 areas, until flood waters recede.
- 6.3.3 The CoCP Part A and B (Application Document Ref 5.4.2.1 & 2) requires that the Principal Contractor(s) consult with the Environment Agency, Lead Local Flood Authority and any other relevant risk management authorities in respect of the flood risks in the preparation of the Emergency Preparedness Plan for construction work in areas at risk of flooding. The Emergency Preparedness Plan will include details of flood evacuation.

6.4 Construction flood risk mitigation

6.4.1 Elements of the Proposed Development which cross, or are adjacent to the River Cam, will be located either wholly or partially within Environment Agency Flood Zones 2 and 3. These include the outfall, Final Effluent (FE) and storm pipelines, Waterbeach pipeline, and the transfer tunnel.



- 6.4.2 Measures within Section 7.5 Water resources and flood risk within the CoCP Part A and B (Application Document Ref 5.4.2.1-&-2) will be implemented through a Construction Environmental Management Plan (CEMP). The CoCP Part A outlines that all construction activities will be undertaken to avoid any significant increase of flood risk.
- 6.4.3 The CEMP will require that procedures are put in place to deal with potential flood events, as is relevant to the flood risk at each working area. This will include a requirement to sign up to the Environment Agency flood warnings, and identification of emergency evacuation routes and potential refuge areas in the event of a flood.
- 6.4.4 During construction of the outfall, the river section of the cofferdam may locally affect flows and levels of the River Cam. The risk to flood risk elsewhere will be mitigated by works within the cofferdam occurring at a dry time of year when stage levels are not above average, and efficient construction practices reducing the duration in which the river section of the cofferdam is in place, expected to be approximately eight weeks.
- 6.4.5 Works affecting the water course watercourse (main river) would require a separate Environmental Permit (flood risk activities). The works would be carried out in accordance with the conditions of the Environment Permit, and these are expected to include specific flood risk management measures to be agreed with the Environment Agency.
- 6.4.6 Additional construction mitigation measures within the CoCP Part B (Application Document Ref 5.4.2.2) are:
 - A requirement to locate construction compounds t-in Flood Zone 1 where possible;
 - A requirement for loose items within laydown or storage areas within Flood Zones 2 and 3 to be secured to prevent them becoming a debris hazard in a flood event; and
 - A requirement for any material with contaminant potential to be stored **e** in Flood Zone 1 if possible, otherwise above design flood levels.
- 6.4.7 <u>Table 6-1Table 6-1</u> sets out how and when mitigation would be secured.

Works area and activity	Flood risk related mitigation	Secured by	Timing
Waterbeach pipeline construction- water course crossings	Implementation of works to accord with the requirements of the Environmental Permit (Flood Risk Activities) and or Land Drainage Consent.	DCO Schedule 2 Requirement within Schedule 2 of 9 (CEMP) which requires the DCO to implement CoCP	Approved CEMP and associated sub plans prior to commencement of works between Waterbeach and

Table 6-1: Securing flood risk mitigation in construction



Works area and activity	Flood risk related mitigation	Secured by	Timing
	Approved CEMP incorporating requirements within Environmental Permit (Flood Risk Activities) and appended water quality management plan, flood management plan, and emergency response plan	preparation of a <u>CEMP for each</u> phase. Compliance with permit under the Environmental Permitting Regulations Compliance with consents under the Land Drainage Act_(UK Government, 1991)	the proposed WWTP Obtaining licences and consents prior to start of works
Waterbeach pipeline construction - main compound and temporary laydown areas	Implementation of works to accord with the requirements of the Environmental Permit (Flood Risk Activities) and or Land Drainage Consent. Approved CEMP incorporating requirements within Environmental Permit (Flood Risk Activities) and appended water quality management plan, flood management plan, and emergency response plan	Requirement within Schedule 2 of the DCO to implement CoCP Compliance with permit under the Environmental Permitting Regulations Compliance with consents under the Land Drainage Act_(UK Government, 1991)	Approved CEMP and associated plans prior to commencement of works between Waterbeach and the proposed WWTP Obtaining licences and consents prior to start of works
Construction of the outfall	Approved outfall management plan required prior to the commencement of construction activities affecting the River Cam incorporating requirements within Environmental Permit (Flood Risk Activities) Environmental Permit (Discharge to	Requirement within Schedule 2 of the DCO to implement CoCP Compliance with permit under the Environmental Permitting Regulations Compliance with consents under	Prior to construction of the outfall Obtaining licences and consents prior to start of works



Works area and activity	Flood risk related mitigation	Secured by	Timing
	surface water) and Land Drainage Consents	the Land Drainage Act	
		_(UK Government, 1991)	
Temporary compound within the adjacent field to		Requirement within Schedule 2 of the DCO to implement CoCP	Prior to installation of the compound and accesses
the proposed outfall		Compliance with permit under the Environmental Permitting Regulations	Obtaining licences and consents prior to start of works
		Compliance with consents under the Land Drainage Act	
		_(UK Government, 1991)	

6.5 Operation flood risk mitigation

- 6.5.1 The risk of surface water ponding within the excavated area of the WWTP will be mitigated by the Drainage Strategy (Application Document Ref 5.4.20.12), with uncontaminated runoff directed to an attenuation pond within the land required for the landscape masterplan, and subsequently discharged at greenfield rates to a drain linked to Black Ditch.
- 6.5.2 The risk of infrequent emergent groundwater at ground level will also be managed by the Drainage Strategy (Application Document Reference 5.4.20.12). Emergent groundwater at ground level within the proposed WWTP will likewise be directed to the attenuation pond within the land required for the landscape masterplan.
- 6.5.3 Ongoing monitoring of groundwater levels will inform detailed drainage design, emergency attenuation storage volumes and finished ground levels.
- 6.5.4 Operational flood risk within the proposed WWTP from surface water and groundwater sources will be managed by the drainage strategy, which will in turn be informed by continuous monitoring of groundwater levels. <u>at locations specified in</u>



the Outline Water Quality Monitoring Plan (Application Document Ref 5.4.20.13).

The drainage strategy further allows for future expansion of attenuation storage capacity if required. The drainage strategy is therefore considered to be the most vital element of flood risk management within the proposed WWTP and, in combination with flood warning and evacuation measures outlined in Sections 6.2 and 6.3, in effect performs the role of an operational flood risk management strategy.

6.5.5 Within the land required for the landscape masterplan as described within the LERMP (Application Document Reference 5.4.8.14) there will be retention of permeable surfaces in land outside of the earth bank with new planting. This new planting will create a more varied vegetation and habitats around the proposed WWTP which may have a secondary benefit of slowing surface water run-off during more extreme rainfall events. Further measures related to the management of surface water delivered during operation will be implemented through the long term application of the LERMP (Application Document Reference 5.4.8.14) which requires that the operator prepare a detailed management and maintenance plan (secured through requirements in the DCO), based on the LERMP which will be agreed with key stakeholders. Since the LERMP integrates aspects of the Drainage Strategy (Application Document Reference 5.4.20.1) the detailed surface water drainage design shall be prepared to account for the detailed management of the LERMP.



7 Conclusion

- 7.1.1 The Proposed Development involves the construction of a new waste water treatment plant (WWTP) and sludge treatment centre (STC), together with the associated waste water transfer infrastructure comprising waste water transfer tunnel, sewer rising main diversions and a treated effluent transfer with an outfall to the River Cam. The Proposed Development also includes a transfer pipeline corridor from a new pumping station constructed close to the existing Waterbeach Water Recycling Centre (WRC). The proposed WWTP would include above and below ground structures, and associated tunnels and pipelines which connect to proposed or existing infrastructure will be below ground.
- 7.1.2 The Environment Agency Flood Map for Planning demonstrates that the 'Less Vulnerable' proposed WWTP will be sequentially located entirely within Flood Zone
 1. 'Water compatible' infrastructure (outfall, pipelines and tunnel) which would be located in Flood Zones 2 and 3 would not be considered to be at high risk from fluvial flooding, assuming the application of best practice construction methodology.
- 7.1.3 Fluvial modelling (Application Document Reference 5.4.20.5), which includes an allowance for climate change, indicates that increased discharge from the proposed outfall will have a negligible effect on River Cam water levels, flows and flood extents. Fluvial modelling compares fluvial flows inclusive of treated effluent from the existing WWTP, to those from the proposed WWTP. The existing Cambridge WWTP supports the current Greater Cambridge population. The proposed WWTP includes phased development to support expected population growth to the year 2041. Three model scenarios were run in order to decouple flood risk related solely to the location and discharge infrastructure of the proposed WWTP, from flood risk related to predicted population growth to the year 2041. Results are summarised as follows;

7.1.4 Fluvial Impact due to relocation of WWTP

 The proposed WWTP would have a negligible impact on fluvial flood risk compared to the existing Cambridge WWTP, when the same (2041) population assumption is applied to both models, and no mitigation is required.

7.1.5 Fluvial Impact due to population growth

 As population increases from the present day to the year 2041, there may be slightly increased flood depths (centimetres), to third party receptors located in Flood Zone 3 which are currently at risk of flooding. Receptors potentially impacted due to population growth include agricultural land between Milton and Waterbeach and at Cam Washes SSSI, residential properties at Bannold Road, Long Drove and Dimmock's Cote Road, and marinas at Cambridge Motor Boat Club and the Fish and Duck Marina. Increased flood depths occur typically for only one or two specific modelled events, which vary per



location, and do not propagate through to higher order events. There would be no change in flood hazard classification at residential receptors resulting from these slight increases in flood depths.

- In terms of both location and severity, there is inconsistency in modelled population growth impacts on third-party receptors across different modelled flood events. This combined with conservative modelling assumptions, introduces uncertainty regarding whether there is a genuine impact. The pathway to securing mitigations to address these uncertain impacts is discussed in Appendix C.
- 7.1.37.1.6 During construction of the outfall, a cofferdam will be used to maintain dry conditions. The cofferdam is expected to be constructed in two sections: a land section and a river section. The river section of the cofferdam will be in place for a limited period of approximately eight weeks in order to minimise river constriction impacts. Construction behind the land section of the cofferdam is expected to take up to four months. The river section of the cofferdam may reduce the cross-sectional area of the River Cam which may result in temporary locally increased water-levels and/or velocities within the vicinity of the constriction. The risk to fluvial flood risk elsewhere may slightly increase during the approximate eight week period when the river section of the cofferdam is in place.
- 7.1.47.1.7 Monitored groundwater levels (2021-2022) at the proposed WWTP are relatively close to existing ground level. The proposed WWTP will be situated in an excavated area and, at times of year when groundwater levels are high, the unmitigated risk of groundwater flooding within the proposed WWTP is considered medium to high. The risk of emergent groundwater occurring within the proposed WWTP will be managed by the Drainage Strategy (Application Document Reference 5.4.20.1), which will also serve to manage surface water runoff.
- 7.1.57.1.8 The Drainage Strategy (Application Document Reference 5.4.20.1) includes dedicated drainage for areas of the proposed WWTP which present a contamination risk. Potentially contaminated surface water runoff will be returned to the head of the works for treatment. Runoff from uncontaminated areas and emergent groundwater, if present, will be directed to an attenuation pond located within the land required for the landscape masterplan. Outflow from the pond will be restricted to Black Ditch.

7.1.67.1.9 The surface water (pluvial) flood risk for the land required for the construction of the proposed WWTP is considered very low. However, the proposed WWTP will be located in an excavated area slightly below external ground level and may therefore be at increased risk of surface water (pluvial) ponding within the perimeter of the proposed WWTP. Surface water runoff within the proposed WWTP and access roads will be managed by through the requirement to prepare a detailed



drainage design informed by the Drainage Strategy (Application Document Reference 5.4.20.1).

7.1.77.1.10 Detailed surface water drainage design informed by Drainage Strategy (Application Document Reference 5.4.20.12) and associated operational management actions are considered to be the most vital element of flood risk management within the proposed WWTP and, in combination with flood warning and evacuation measures, in effect performs the role of an operational flood risk management strategy.



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Cambridge Waste Water Treatment Plant Relocation Project Flood Risk Assessment



Appendices



Appendix A - Residual Risk Matrix

Table 2 Residual Risk Likelihood Consequence table

			Conse	quence	
		High	Medium	Low	Very Low
Likelihood	High	Very high risk	High risk	Moderate risk	Moderate/low risk
	Medium	High risk	Moderate risk	Moderate/low risk	Low risk
	Low	Moderate risk	Moderate/low risk	Low risk	Very low risk
	Very Low	Moderate/low risk	Low risk	Very low risk	Very low risk

Based on UK Water Industry Specification WIS 4-01-04 Appendix D guidelines (UK Water Industry, 2018).

Table 3 Residual Risk Definitions

	Likelihood	Consequence
High	Likely to occur under most/all circumstances	Increased flood risk to essential infrastructure, highly or more vulnerable developments
Medium	Fairly likely to occur, under a reasonably wide range of conditions	Increased flood risk to less vulnerable developments
Low	Fairly likely to occur, under a reasonably wide range of conditions	Increased flood risk to water compatible development
Very Low	May occur in exceptional circumstances	Negligible change to flood risk



Appendix B – Figures

Cambridge Waste Water Treatment Plant Relocation Project Flood Risk Assessment



Figure 1 Location of Proposed Development



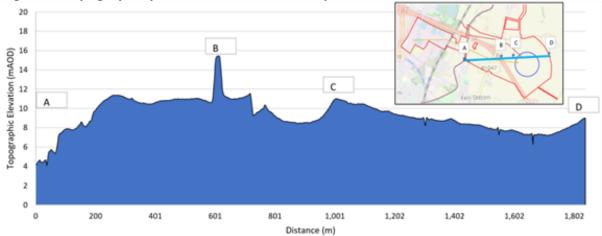
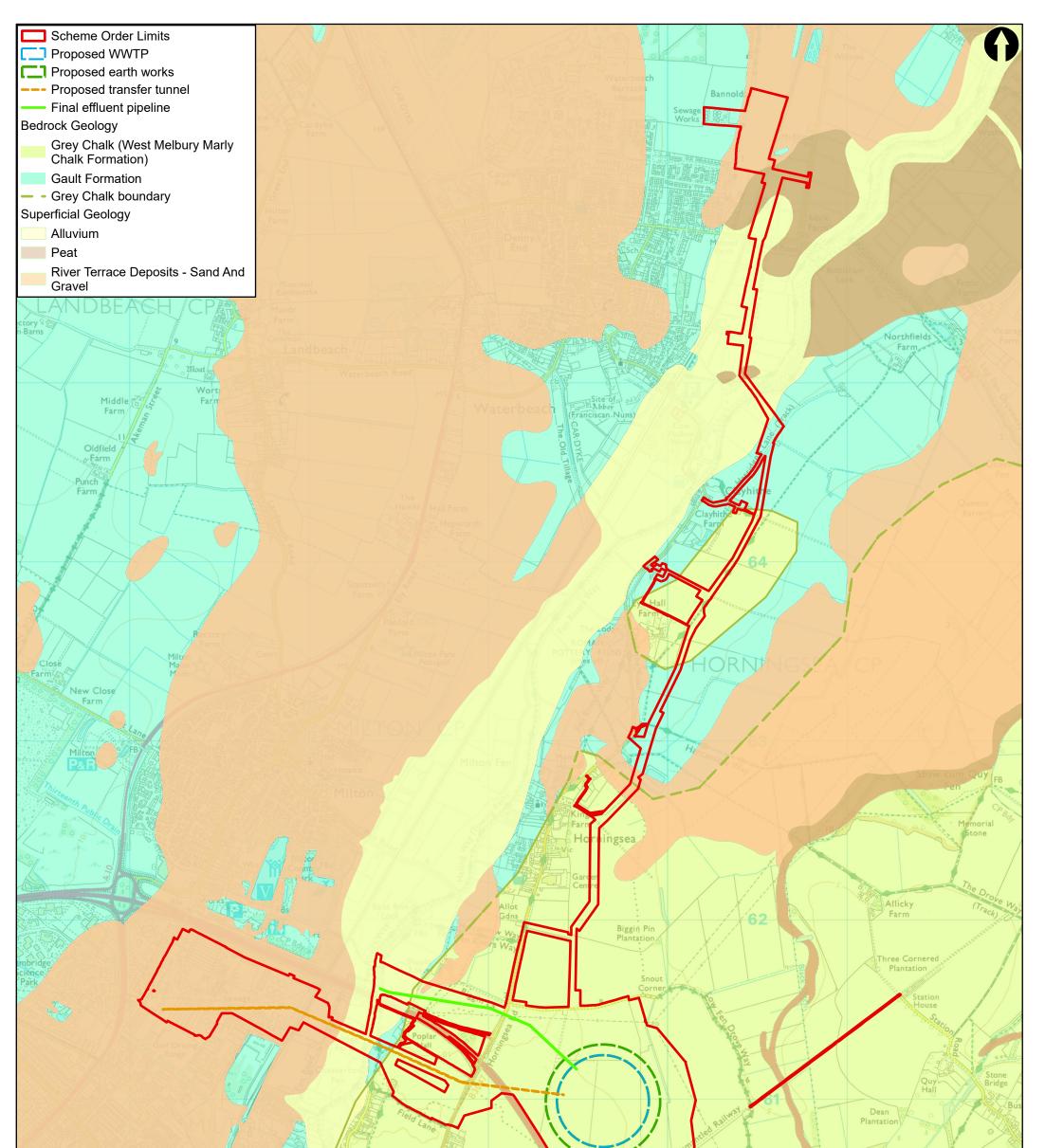


Figure 2: Topographic profile ABCD. Inset shows position of transect

Source: 2m LiDAR data



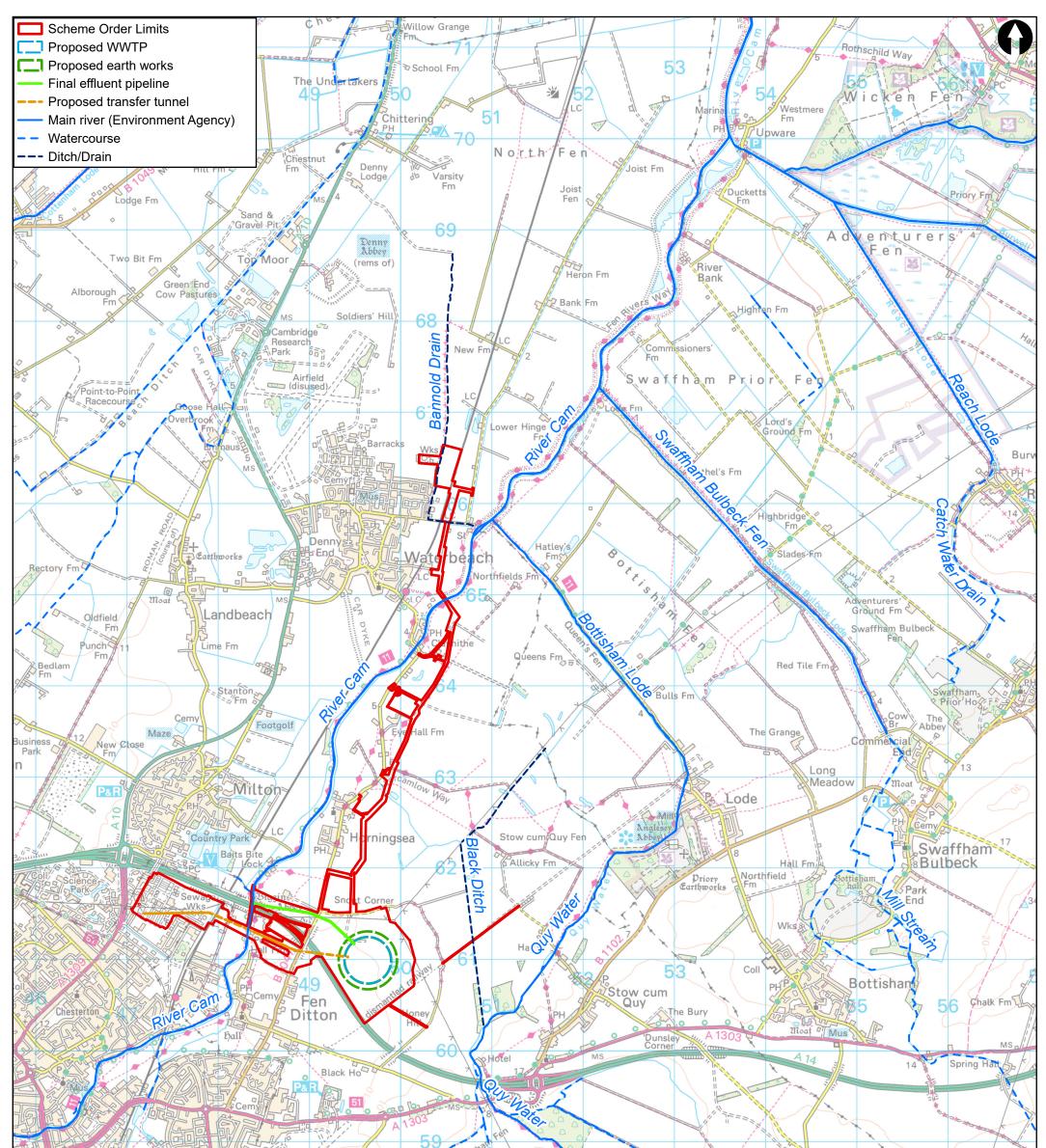
Figure 3 Superficial and bedrock geology



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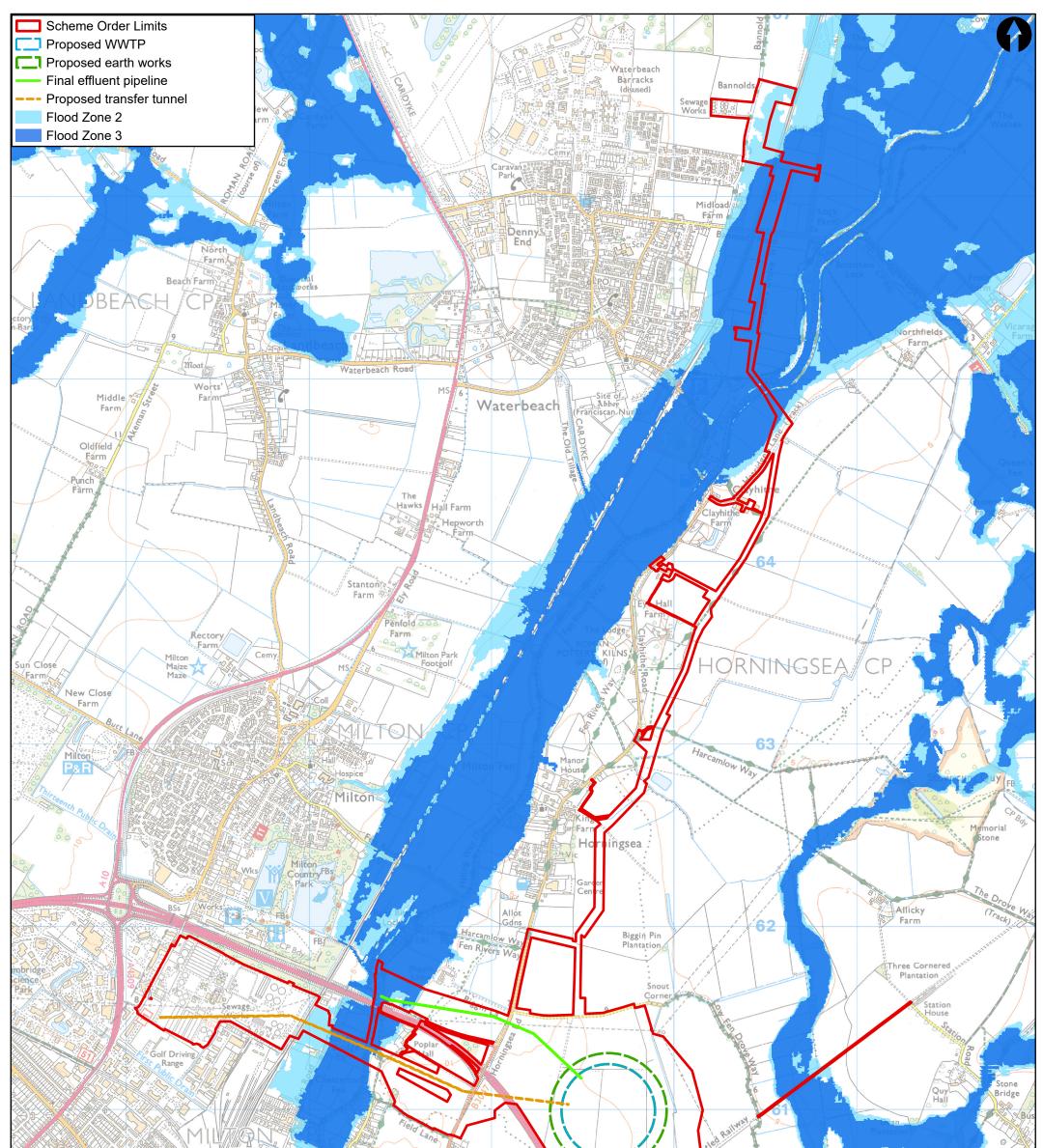
Figure 4: Environment Agency main rivers and ordinary watercourses



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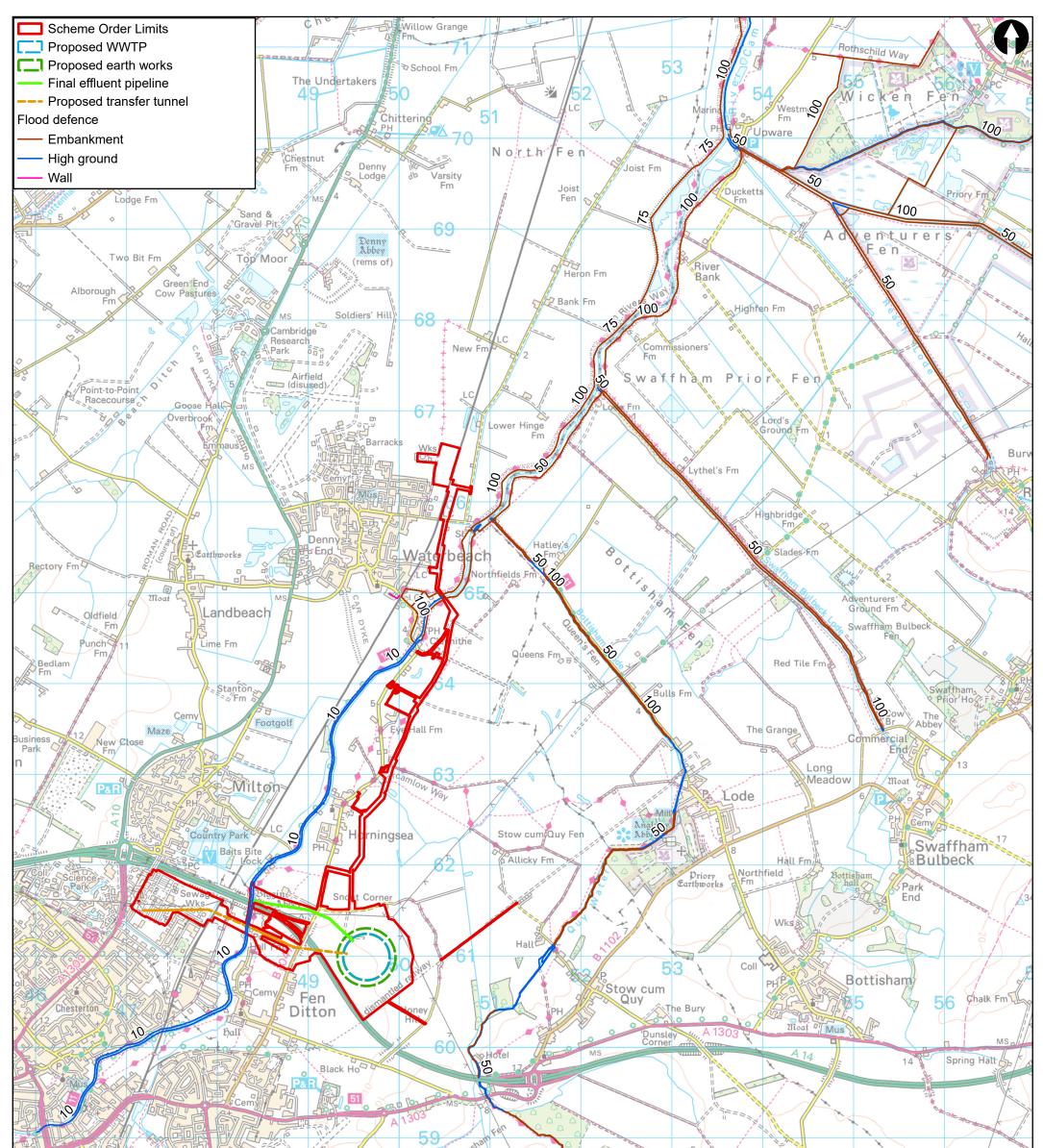
Figure 5: Flood Zones



Flood zones: Environment Agency, 2 Basemapping: © Crown copyright a © Mott MacDonald Ltd. This document is issued for the party which co	ents: Anglian Water Services @ One, 2022-2 2022 and database rights 2021 OS 100022432 promissioned it and for specific purposes connected wit acces of this document being relied upon by any other po	h the capti	tton hall oned project only.			sed for any ot			FB Loop	1,	TMetres 500
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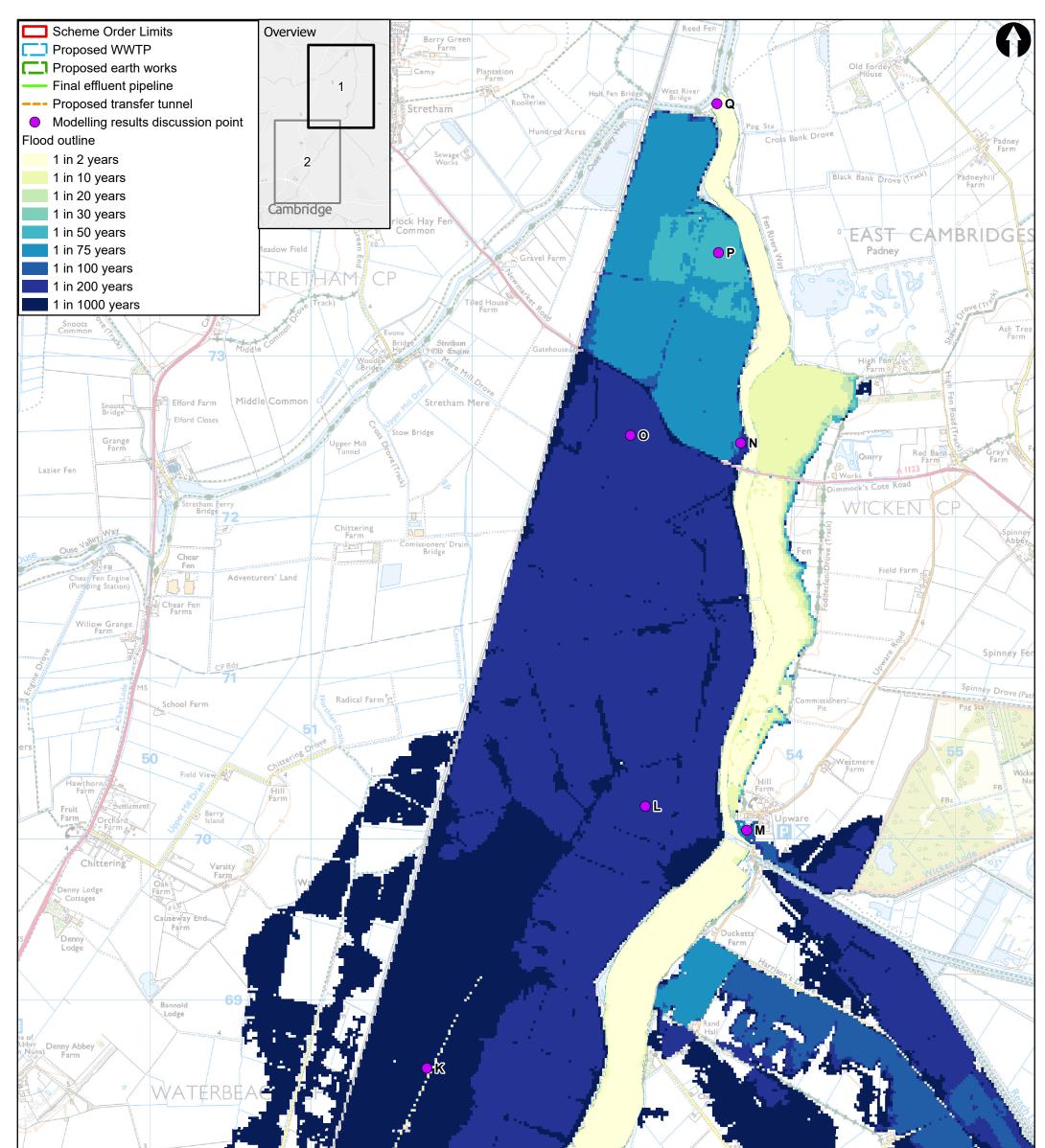
Figure 6: Environment Agency Flood Defences Standard of Protection in years



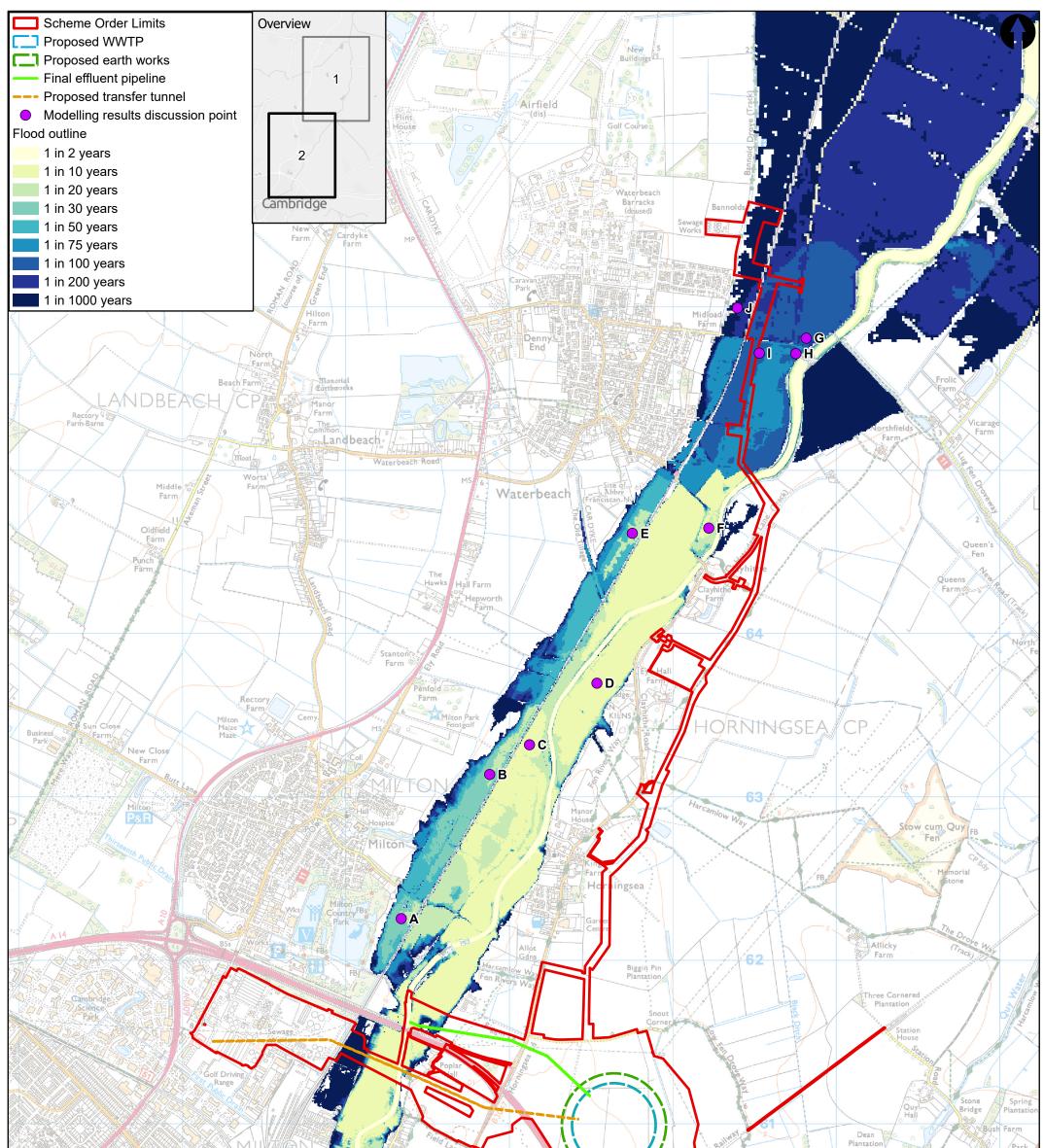
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Figure 7: Flood outlines existing Cambridge WWTP – baseline



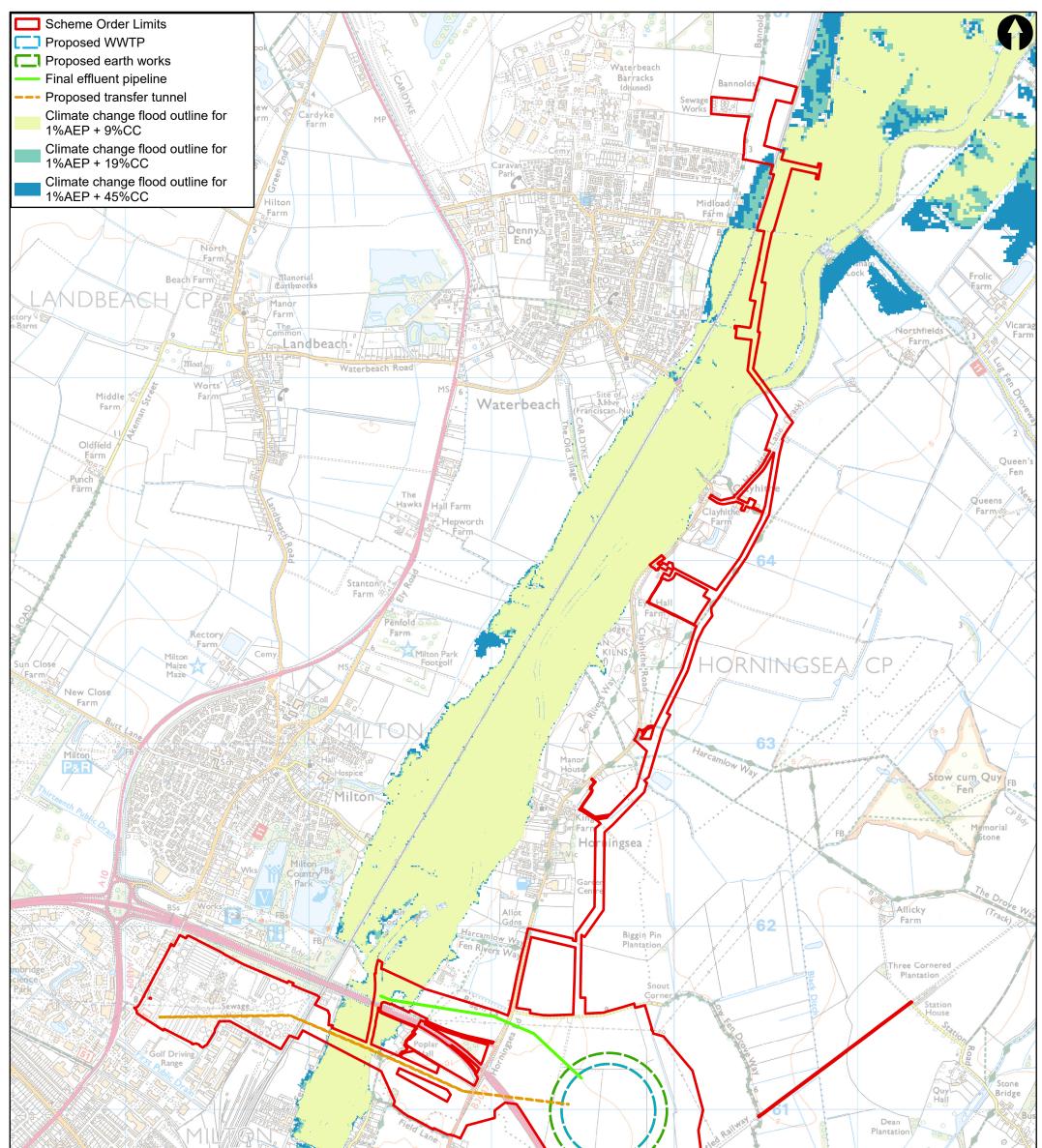
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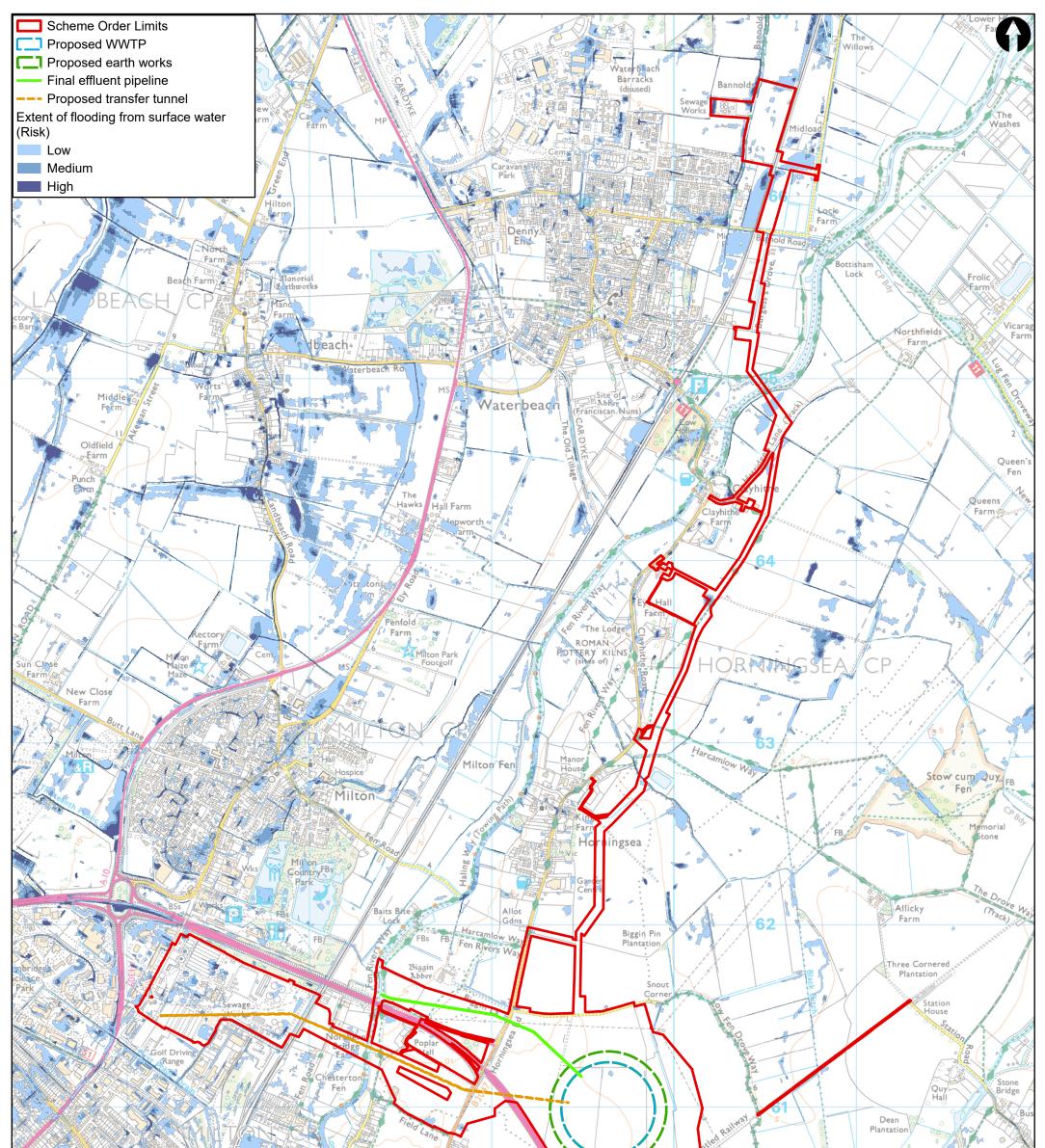
Figure 8: Modelled node locations in relation to the Proposed DevelopmentClimate change flood outlines existing WWTP - baseline



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Figure 9: Climate change flood outline for 1%AEP + 20%CC Extent of Flooding from Surface Water



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Figure 10: Extent of Flooding from Surface Water (source: Environment Agency)



Figure 11: Sewer Flooding incidents by postcode

Postcode	Number of	Sewer Floodin	ng Incidents
	Internal	External	Total
CB1	3	0	3
CB10	n/a	n/a	0
CB11	n/a	n/a	0
CB2	n/a	n/a	0
CB21	0	8	8
CB22	2	4	6
CB23	2	19	21
CB24	2	10	12
CB25	1	7	8
CB3	1	2	3
CB4	0	3	3
CB5	0	1	1
CB6	n/a	n/a	0
CB7	n/a	n/a	0
CB8	n/a	n/a	0
CB9	n/a	n/a	0

Postcode	Number of	Sewer Floodin	ng Incidents
	Internal	External	Total
CB1	3	0	3
CB10	n/a	n/a	0
CB11	n/a	n/a	0
CB2	n/a	n/a	0
CB21	0	8	8
CB22	2	4	6
CB23	2	19	21
CB24	2	10	12
CB25	1	7	8
CB3	1	2	3
CB4	0	3	3
CB5	0	1	1
CB6	n/a	n/a	0
CB7	n/a	n/a	0
CB8	n/a	n/a	0
CB9	n/a	n/a	0

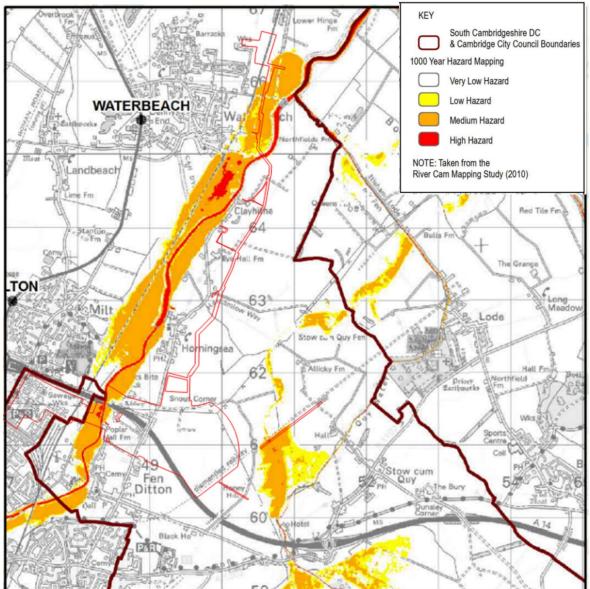
Source: Greater Cambridge SFRA (2021), based on Anglian Water DG5 register.

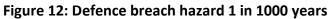
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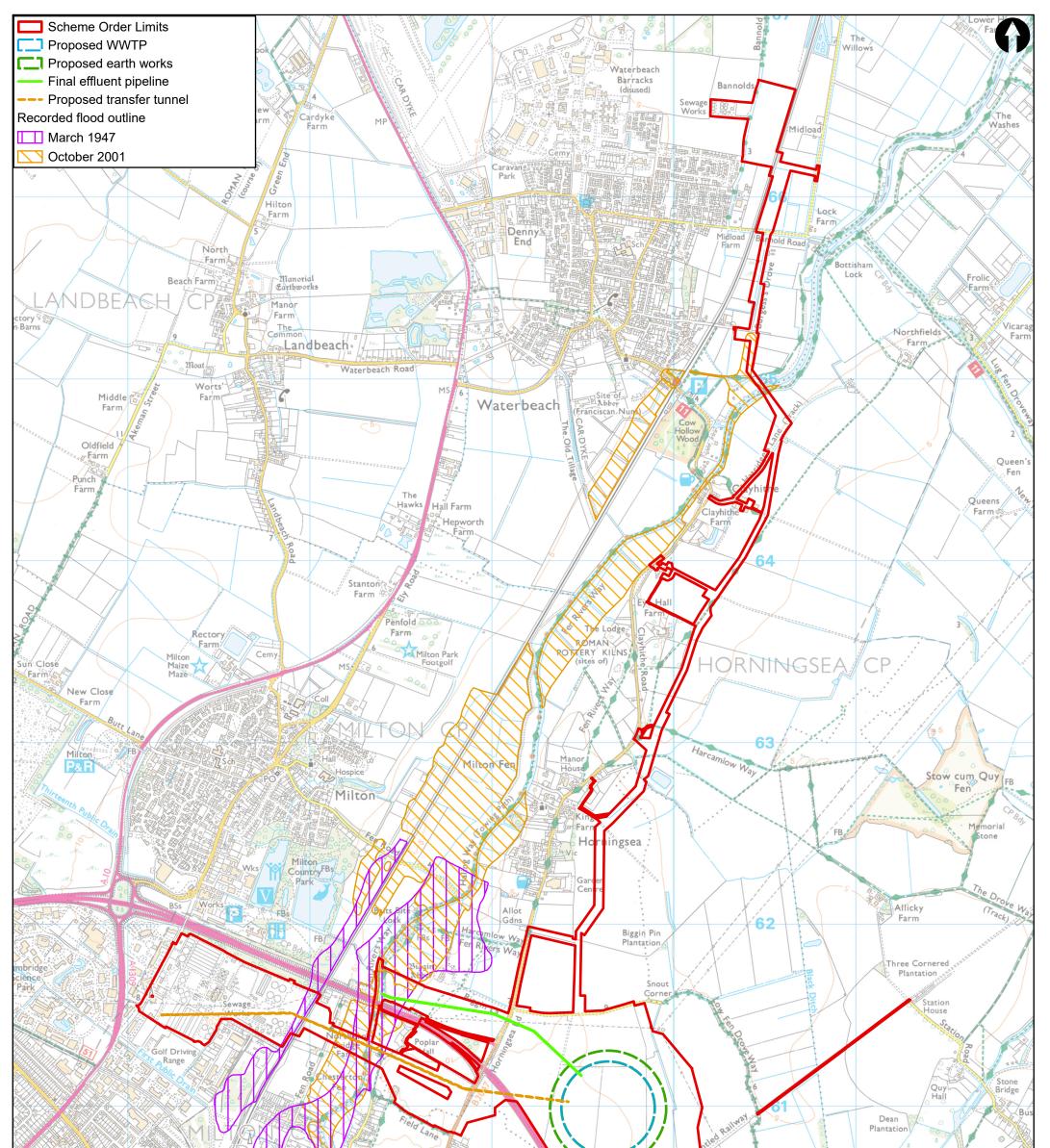
Figure 11: Historic Fluvial Flood Outlines







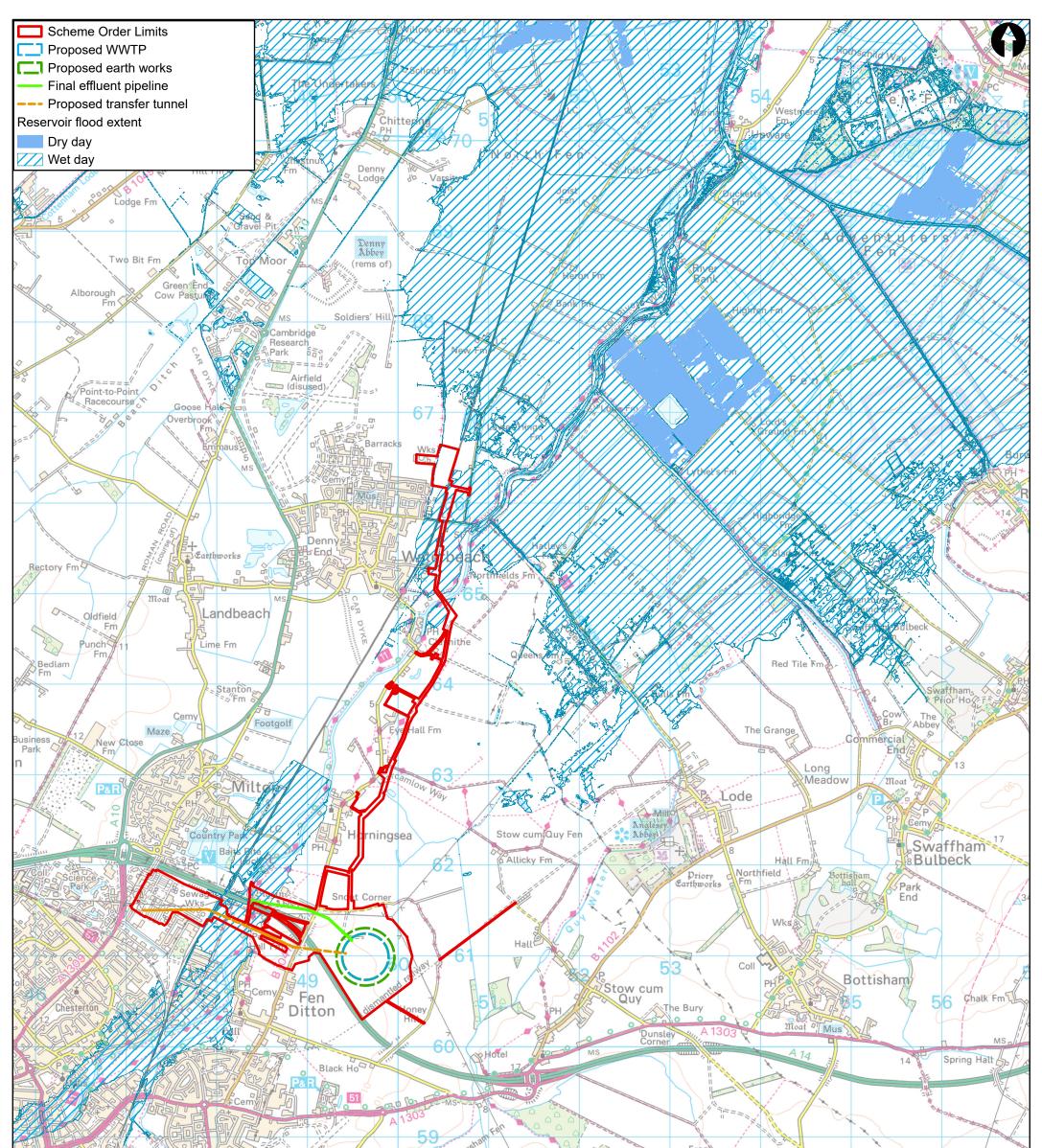
Source: Cambridge and South Cambridgeshire SFRA, 2010



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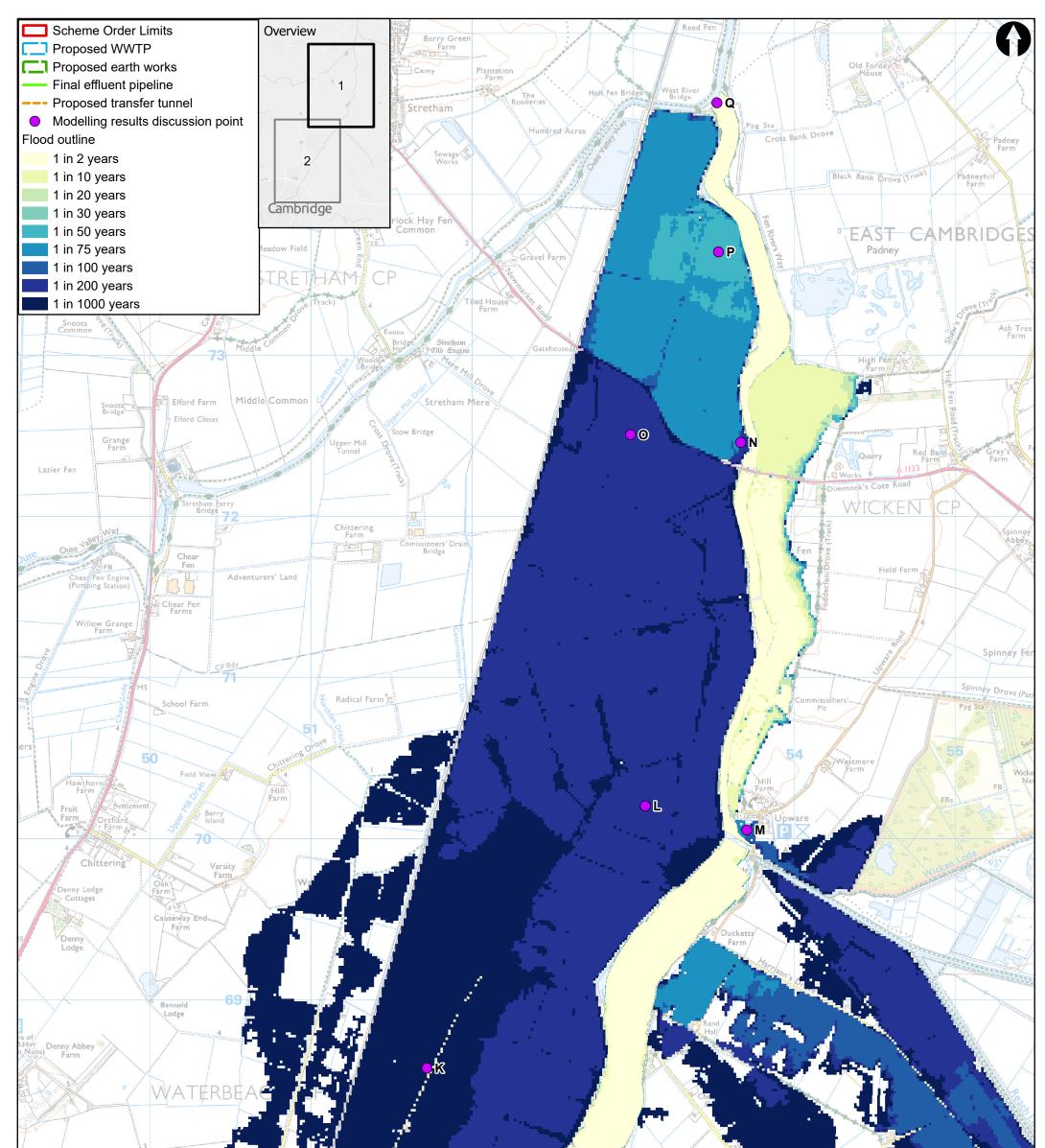
Figure 13: Reservoir flood extents for 'wet day' and 'dry day' scenarios



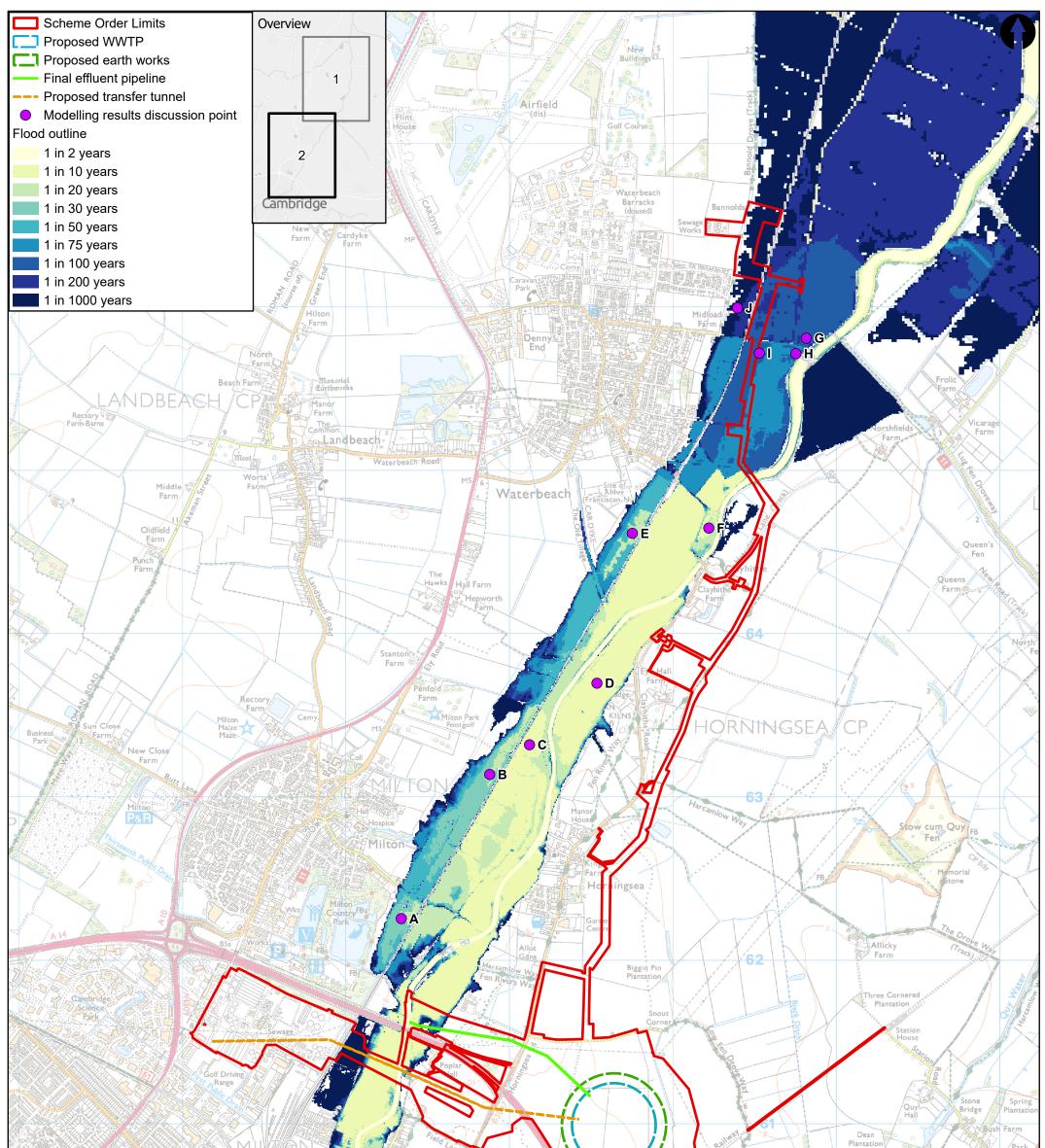
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Figure 14: Flood outlines proposed WWTP – future baseline (2041)



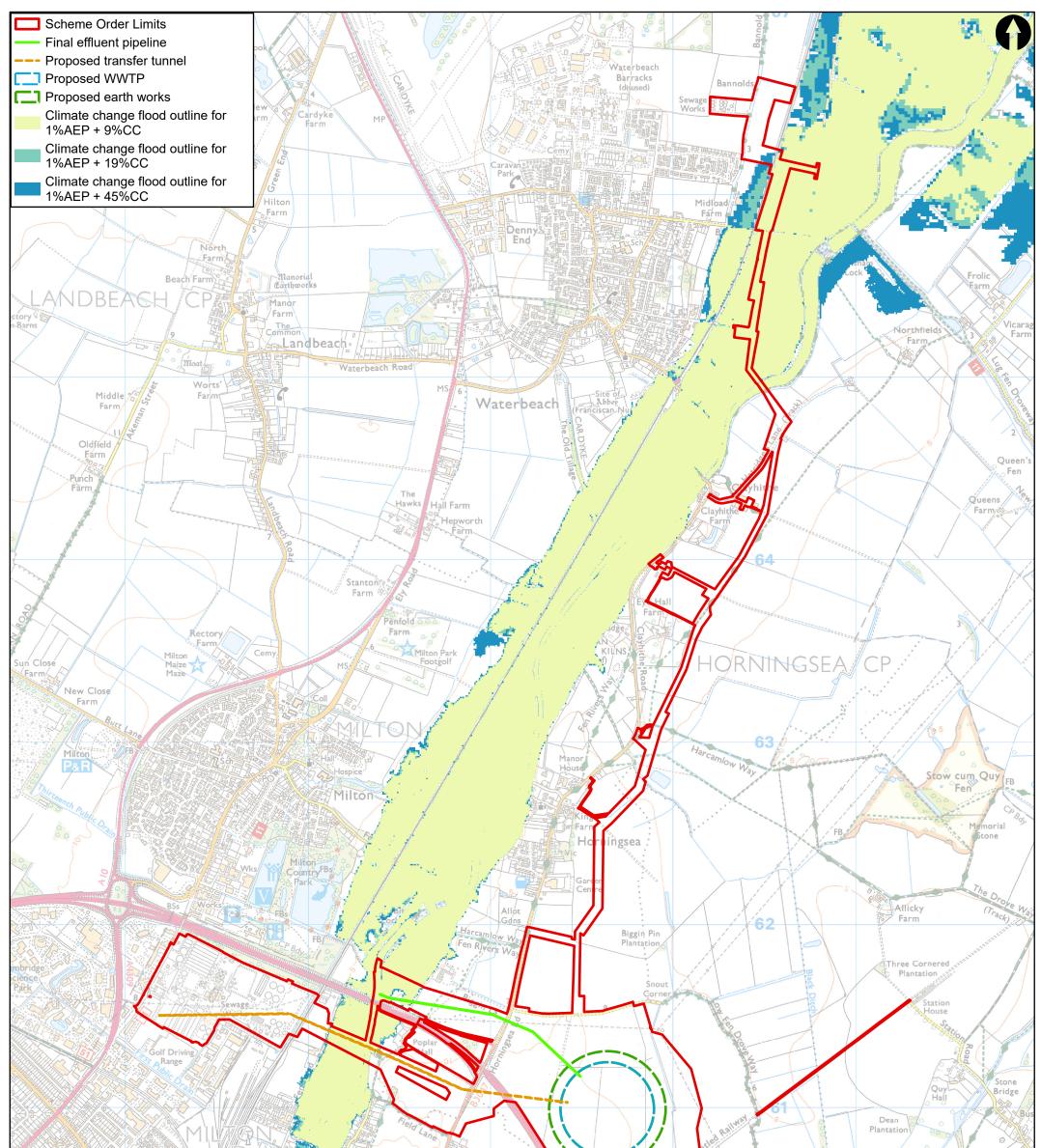
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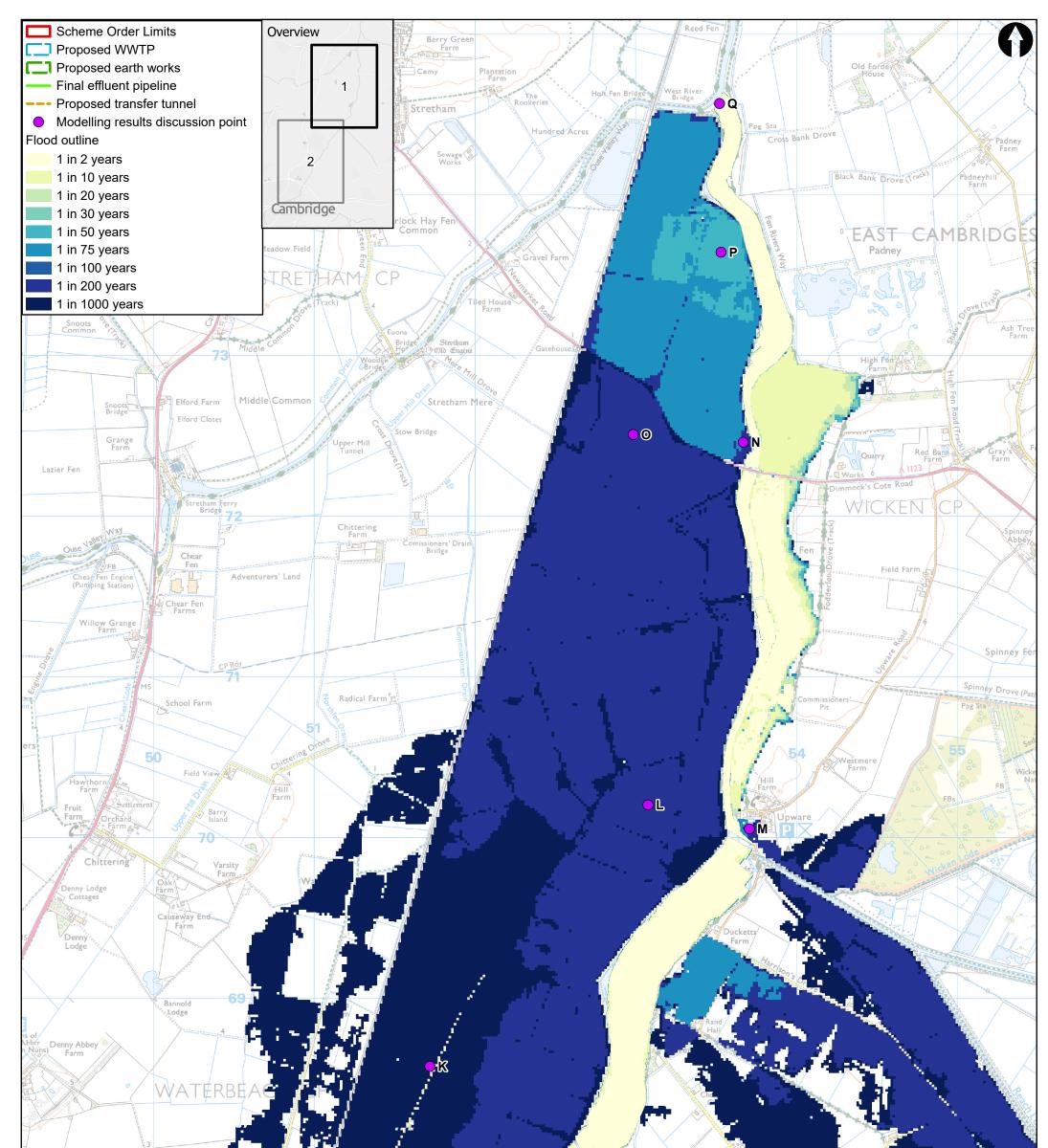
Figure 15: <u>Climate change</u> flood outlines <u>inclusive of treated effluent discharge from</u> proposed WWTP <u>– future baseline (2041)</u>



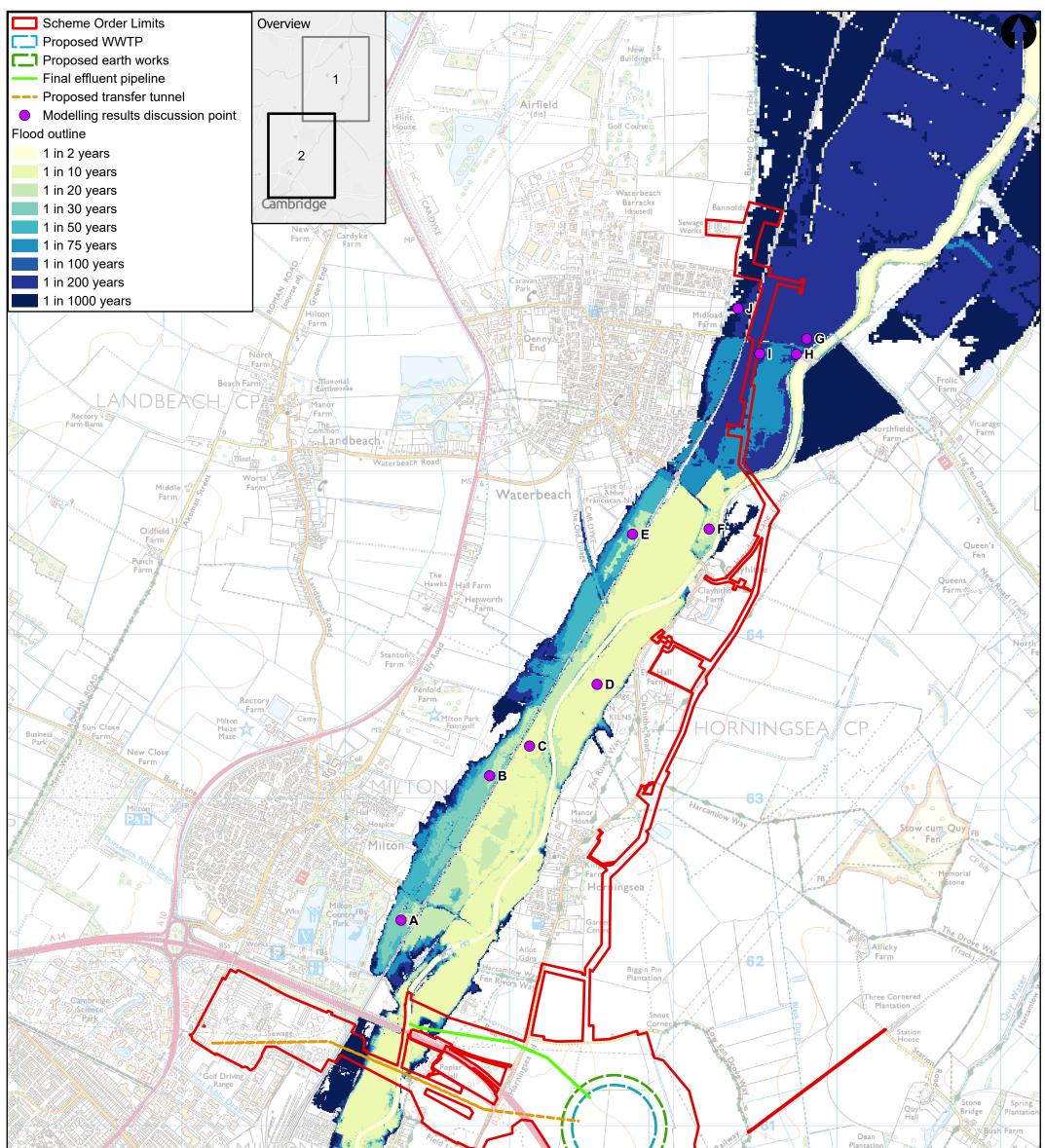
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Figure 16: Flood outlines existing WWTP – future baseline (2041)



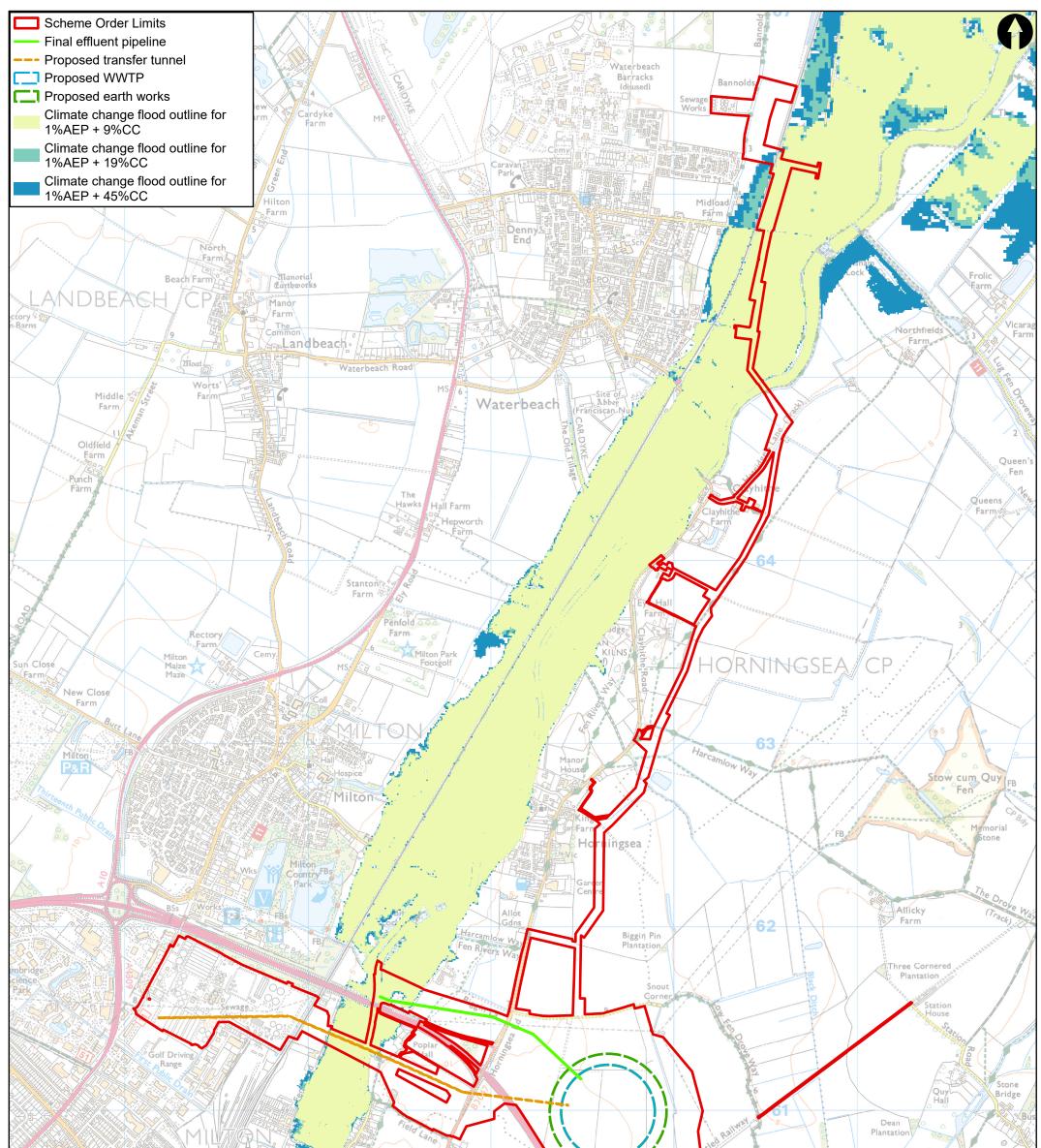
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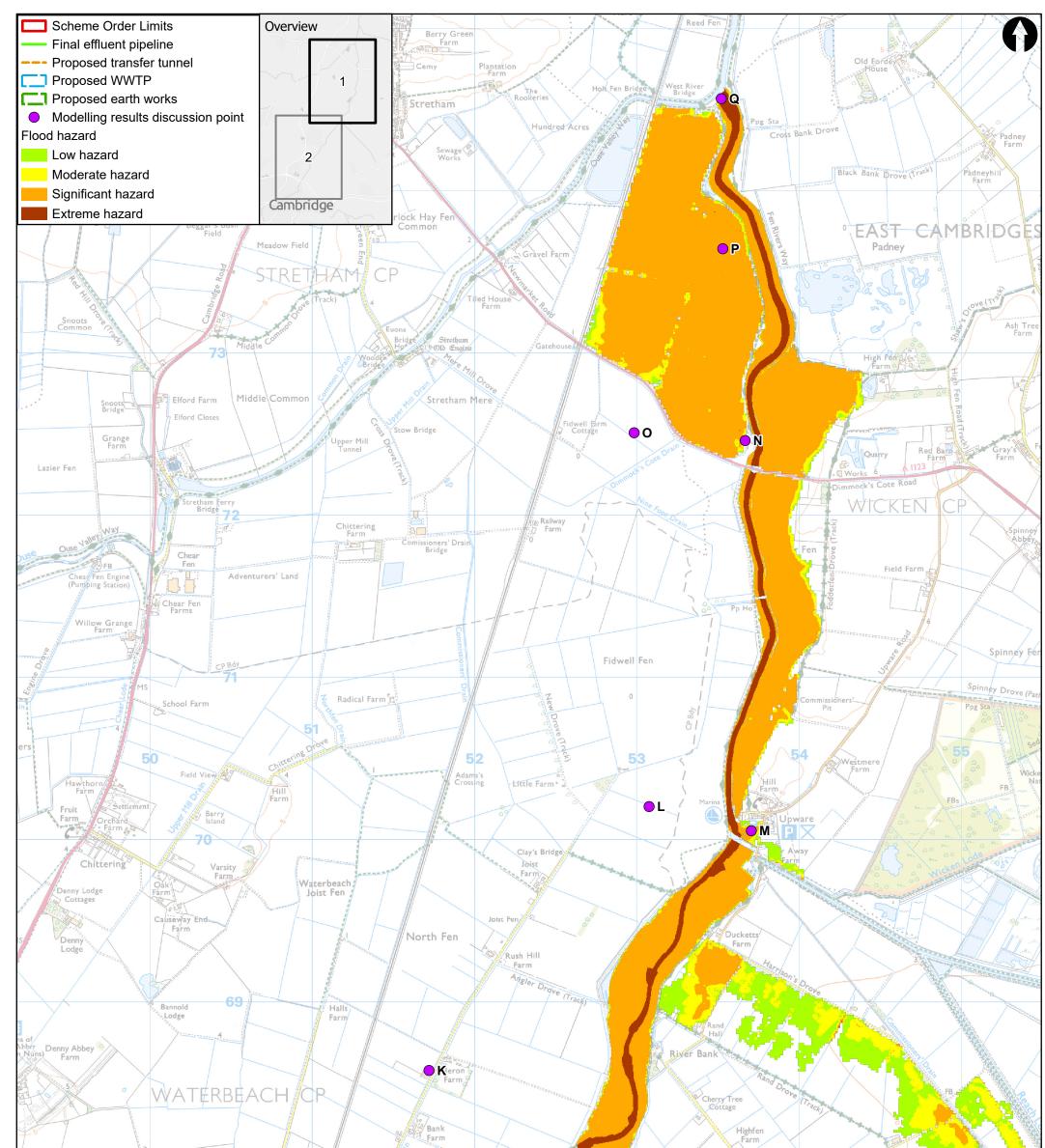
Figure 17: Climate change flood outlines existing WWTP – future baseline (2041)



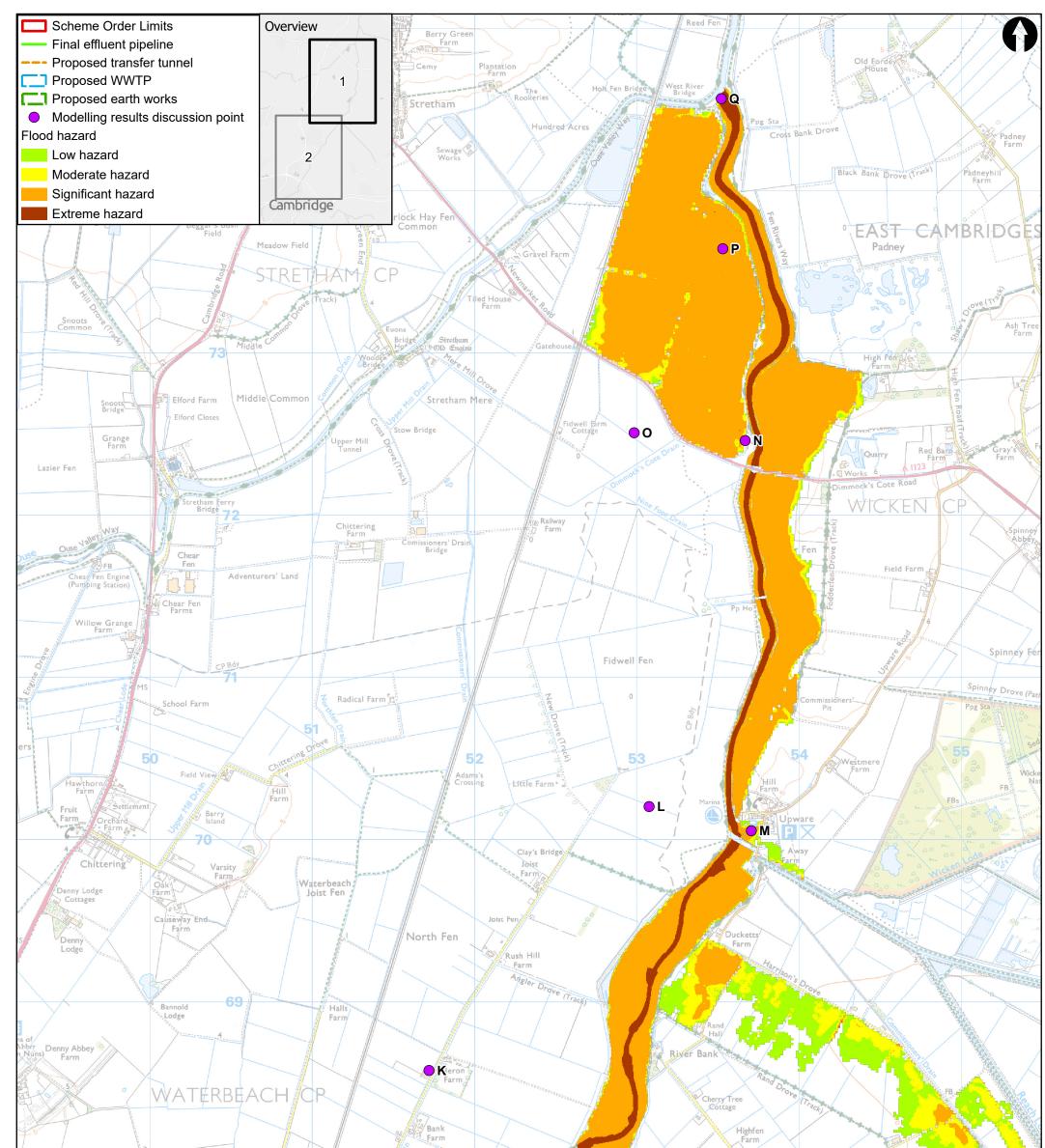
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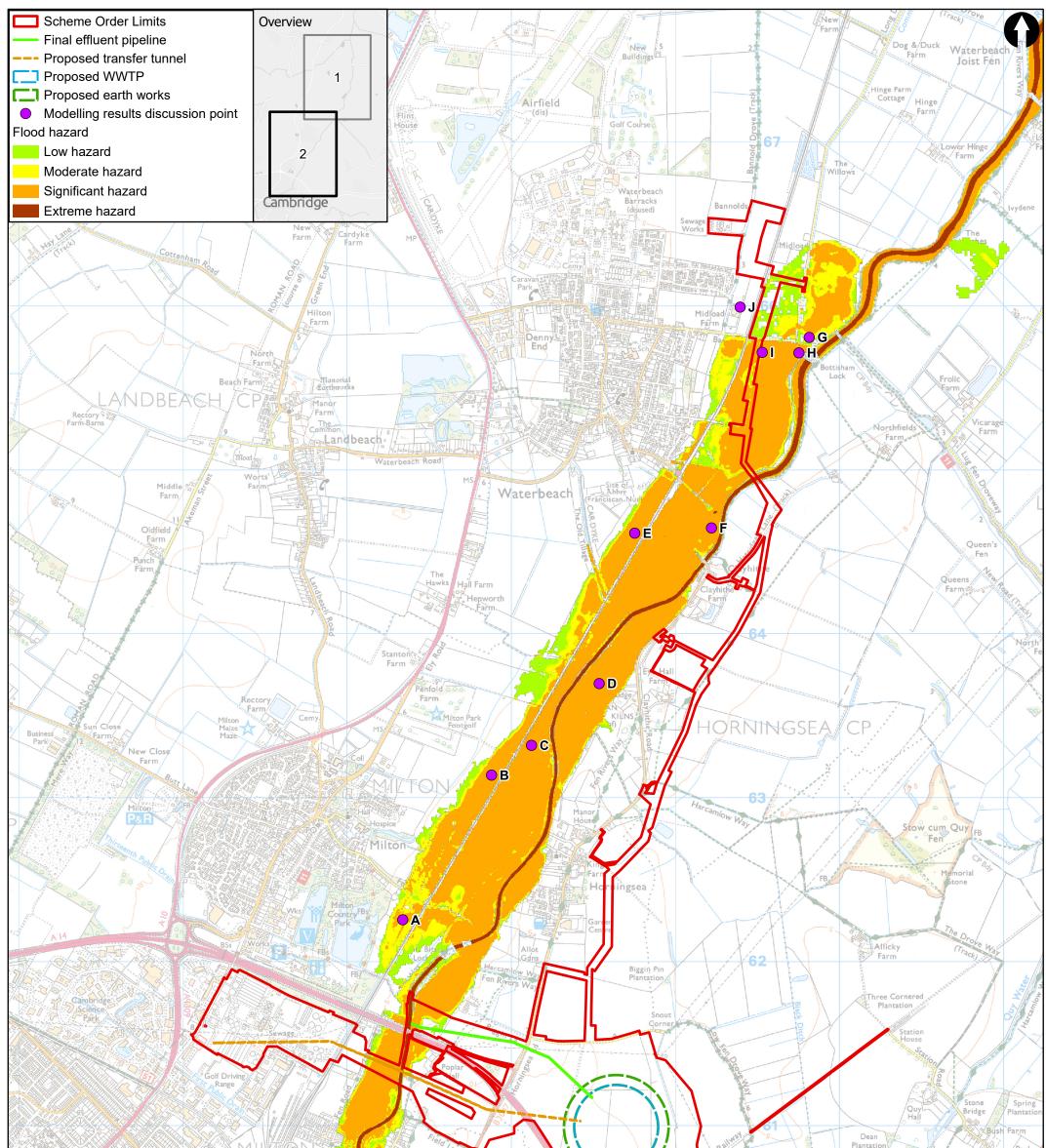
Figure 18: Flood hazard 1% AEP existing Cambridge WWTP – baseline



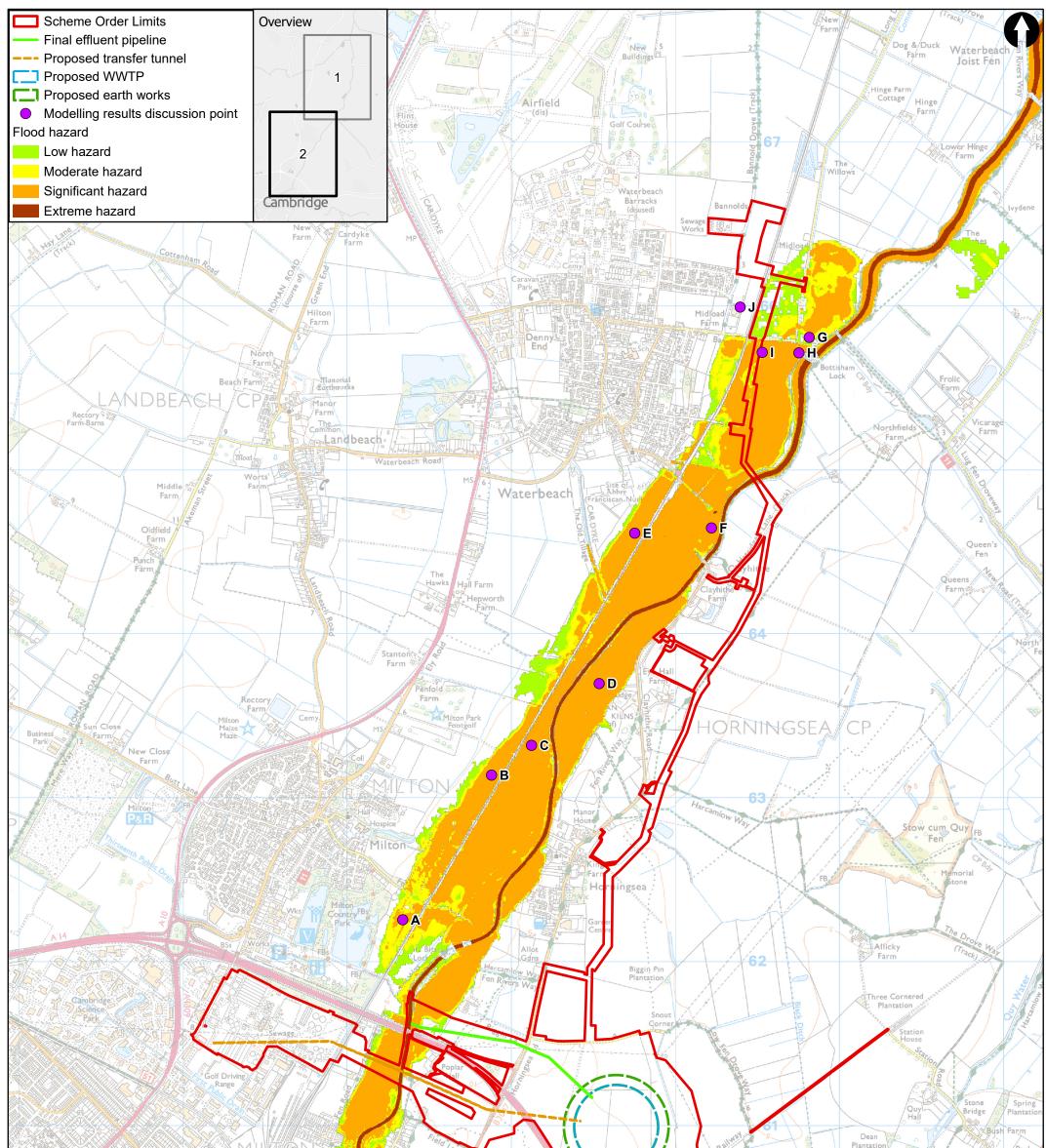
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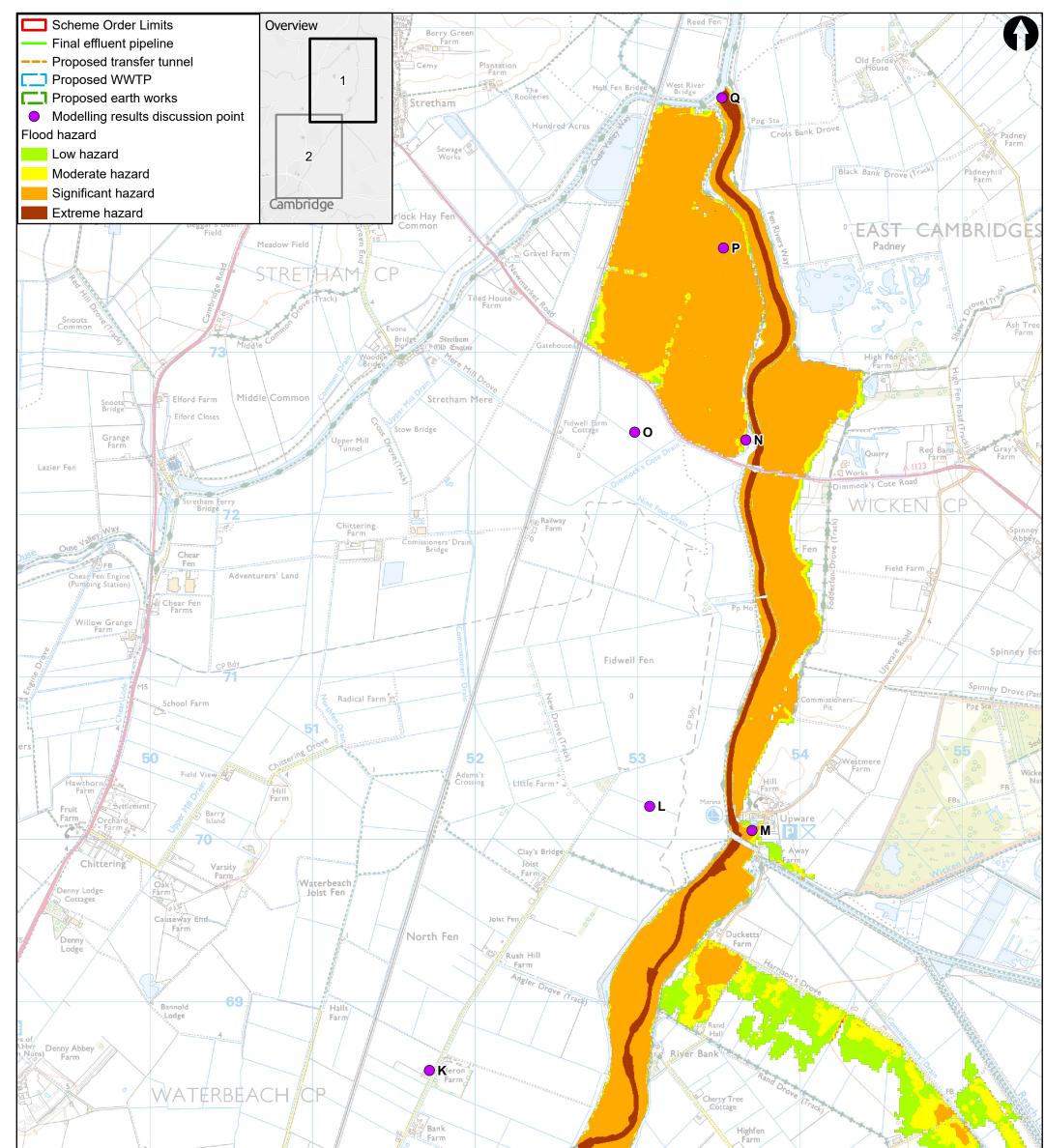
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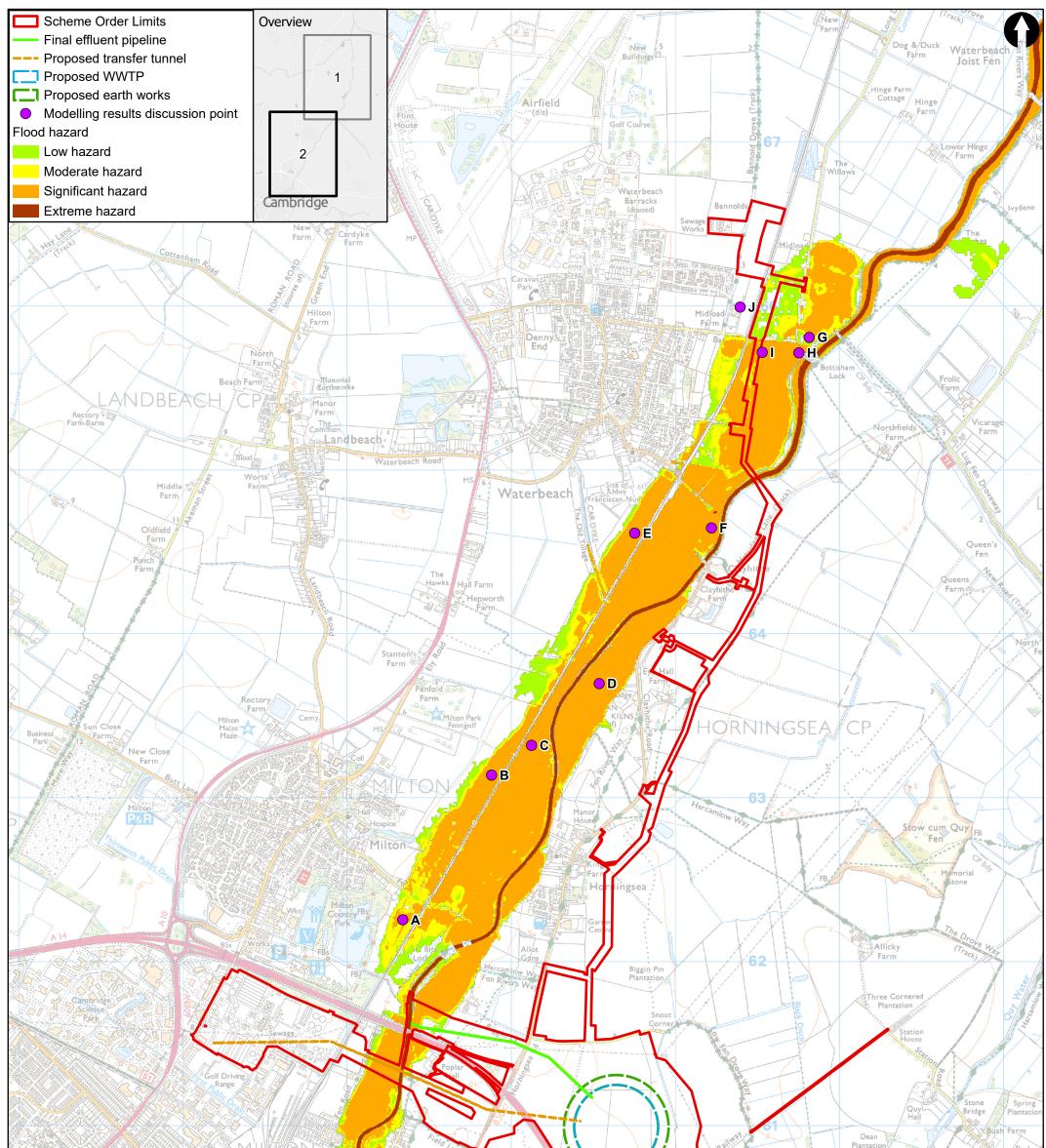
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Figure 19: Flood hazard 1%AEP existing Cambridge WWTP – future baseline (2041)



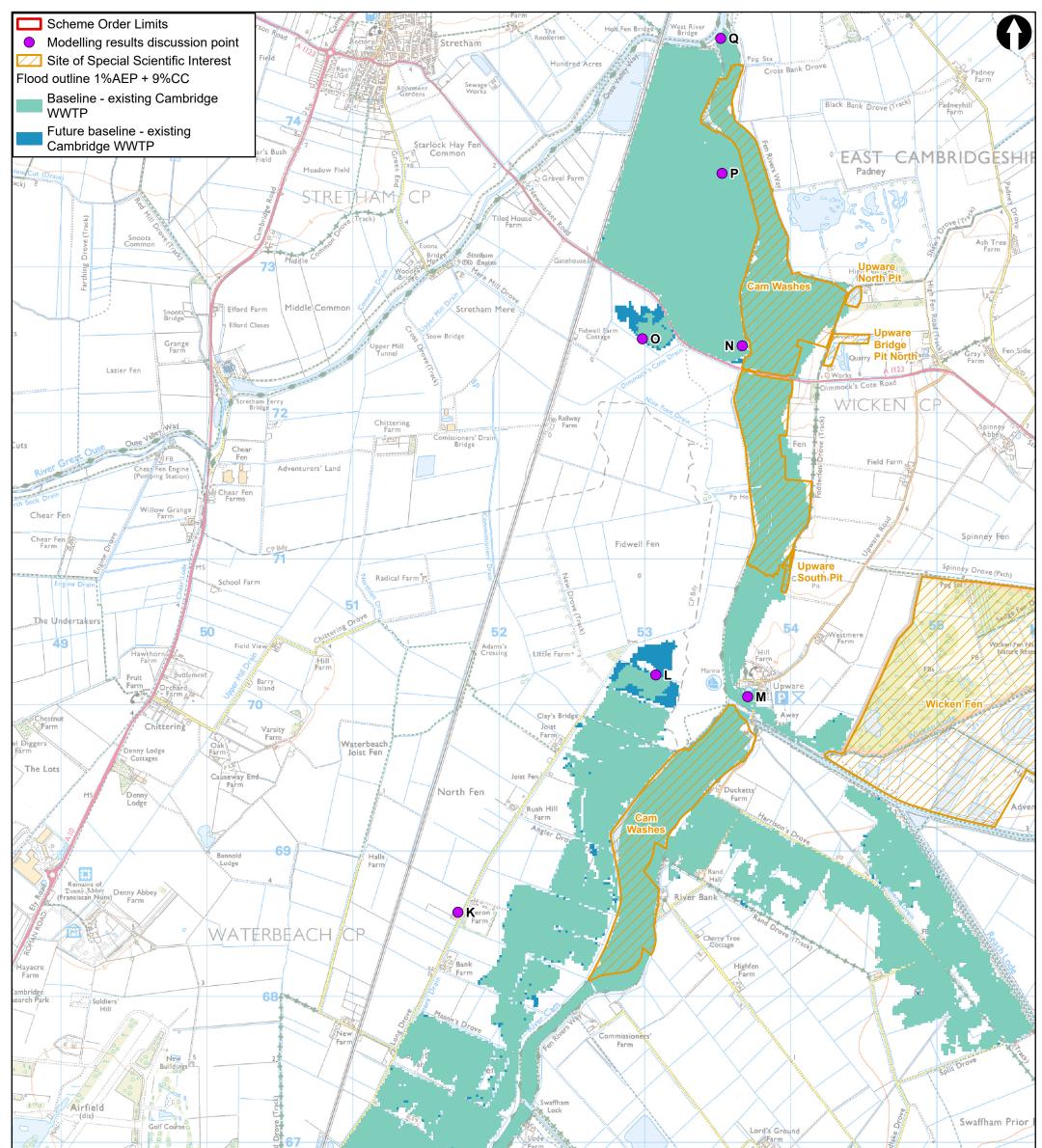
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Figure 20: Flood outlines Cam Washes SSSI – 1% AEP + 9% CC



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Appendix C – Position Statement on Mitigation

Position Statement for Environment Agency, local planning authorities and Examining Authority on the Flood Risk Assessment (FRA) for the proposed development.

Relocating the waste water treatment plant will not significantly increase flood risk. The modelling supporting the FRA shows, through the "*Existing with Growth*" model runs, that any additional flooding arising in the 2040s would occur regardless of the relocation of the WWTP.

The project proposals are not directly contributing to flood risk, but, rather, increased flows to the River Cam (either directly or via the plant) are arising, incrementally and collectively, from an assumed, and conservatively modelled, variety of sources. Such sources include increased waste water flows from new developments within the Cambridge and Waterbeach catchments, surface water runoff, and increased flows in the River Cam due to storm events.

The National Policy Statement for Waste Water (NPSWW) does not require the proposed development to address these unrelated flood events. It is clear from sections 6.4.17 - 6.4.23 of the NPSWW that the mitigation envisaged for potential flood risks relates to impacts arising directly from development and primarily relate to the application of the sequential test and the design of drainage systems. Nor does the National Planning Policy Framework (NPPF) require mitigation for cumulative flood risk not arising from the proposed development – the tests set out at paragraph 173 of the NPPF have all been met by the project. In this context the development-proposal specific provisions of the Planning Practice Guidance "Flood risk and coastal change" (PPG) are not relevant. However, notwithstanding that point, in any event none of the impacts highlighted in paragraph 049 of the PPG will arise; these relate to loss of floodplain storage, deflection or constriction of flood flow routes or inadequate management of surface water.

The project has been designed, in consultation with the Environment Agency, to deliver appropriate storm management mitigation to deliver permitted water quality standards into the 2090s. This water quality performance is primarily managed through the environmental permit for the Proposed Development. The environmental permit is not, and should not, be used as a tool for the management of strategic (catchment wide) flood risk arising from multiple sources; this is not the intent of the permitting regime, nor, as discussed above, is such an approach envisaged by planning policy. Indeed, the NPPF and PPG specifically direct that cumulative impacts be addressed through the strategic planning process and the regulation of proposed developments seeking planning permission which could directly increase flood risk (paragraph 166 and paragraph 004 respectively).

The Applicant believes that future flood risk arising from increased waste water flows in combination with comparatively rare storm events cannot be the sole responsibility of sewage undertakers; to do so would inflict significant additional expense on customers through the development of disproportionately sized infrastructure. It is preferable to manage flood risk upstream, rather than downstream at the "last line of defence". The future levels of waste water flows are best managed at source, through the planning

system and in accordance with planning policy; for example, through the application of *Grampian* type conditions in respect of drainage schemes for new developments, through appropriate separation of surface water drainage and/or through enhanced maximum per capita consumption levels for dwellings in local plans.

The Environment Agency and the local planning authorities, in pursuance of their statutory obligations, are best placed to ensure that good practice on water consumption and sustainable drainage is applied throughout the catchment which the proposed WWTP will serve, including in respect of future planning applications. The local planning authorities also play an important role in managing future flood risk through the Strategic Flood Risk Assessment process.

Based on the above, the Applicant is therefore proposing that, relying on the evidence of the modelling and planning policy, that the following five points can be agreed with the Environment Agency and presented to the DCO Examining Authority:

- That the modelled future baseline evidences that future flood risk will not arise directly from the Proposed Development. The increased risk ultimately arises from increases in wastewater flows within the catchment, regardless of the downstream treatment process.
- That the incremental contribution of the proposed development to flood risk is extremely low (or possibly even zero) compared to other factors such as other surface drainage to the river Cam and river flood levels above the project's outfall.
- That in these circumstances planning policy (either in the NPSWW or the NPPF) does not require mitigation by the project for such unrelated, cumulative, events.
- That future levels of wastewater flows are most effectively managed at source, through the planning system, for example, through the application of *Grampian* type conditions in respect of drainage schemes for new developments or through enhanced maximum consumption levels for dwellings in local plans.
- That the local planning authority and Environment Agency have the appropriate powers to regulate waste water flows arising from future developments, either through strategic planning processes (in the local plan) or as decision maker and statutory consultee respectively during the determination of future planning applications, as envisaged by the NPPF.



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

You can view all our DCO application documents and updates on the application on The Planning Inspectorate website:

https://infrastructure.planninginspectorate.gov.uk/projects/eastern/cambri dge-waste-water-treatment-plant-relocation/

