

The Planning Inspectorate  
The Square Temple Quay  
Bristol  
Avon  
BS1 6PN

**Our ref:** AC/2024/132088/01-L01  
**Your ref:** WW010003  
**Date:** 12 April 2024

Dear Sir/Madam

## **CAMBRIDGE WASTE WATER TREATMENT PLANT RELOCATION THE EXAMINING AUTHORITY'S REQUEST FOR FURTHER INFORMATION**

Thank you for your letter of 8 April 2024. Please find our response to your further requests for information below:

### **Question 20 – Flood Risk**

*The Applicant suggests within its FRA [REP6-084] that there would be no increased flood risk on third party land as a result of the Proposed Development in isolation (see paragraphs 4.1.17 – 4.1.21 of the FRA), which appears to be different to your stance taken on this matter [REP6-128]. Please provide further justification for your stance on increased flood risk as a result of the Proposed Development in isolation.*

### **Answer:**

The latest Flood Risk Assessment (FRA)(version 3, dated 22 March 2024), was submitted to us on 25 March 2024 along with an updated model which we have assessed.

We consider that this final FRA is **unacceptable** (Please see our full FRA response submitted separately) and we **object** to this proposal. The FRA shows that there will be an increase in flood risk to third party land for the proposed development in isolation.

The FRA includes an assessment of the impact of the WWTP on flood risk elsewhere due to the relocation of the WWTP in isolation, discounting any cumulative effects due to population growth in the area up to 2041. Although the FRA suggests that the predicted increase in flood risk within two areas of agricultural land is negligible, the modelling shows flood depths increases up to 4cm in one area of agricultural land, which should be considered significant. We would expect the proposal to demonstrate no increase in flood risk in isolation and where possible developments should offer betterment overall. The FRA has not set out any mitigation for these increases in flood risk, nor confirmed that, as a minimum, the effected landowners will be informed. We consider that the relevant landowners should be informed of any increase in flood risk to their land (in terms of any

increased frequency, depth, duration and extent) and evidence that the landowners accept this increase in flood risk to their land should be provided.

### **Question 21 – Flood Risk**

*If you continue to have concerns regarding the Proposed Development and increase in flood risk on third party land at the close of the Examination, do you consider that the Applicant has taken all reasonable steps to try and resolve these concerns in accordance with paragraph 4.4.12 of NPSWW? If not, please confirm what additional steps the Applicant could take to resolve your concerns.*

#### **Answer:**

We continue to have concerns regarding the proposed development and increased flood risk to third party land and property. We do not believe the Applicant has taken all reasonable steps to resolve our concerns. No mitigation has been offered for the increased risk from the proposed development in isolation (question 20) nor for the increased risk from future growth up to 2041.

#### **Additional steps required to resolve our concerns:**

We agree that the actual relocation of the works for the current day will not result in an increase in flood risk. There may be some conservative elements within the modelling, including potential double counting which are difficult to resolve. However, we do still have concerns regarding the flood risk increase due to the proposed development 'in isolation' and for future 'growth up to 2041'. We acknowledge it may be challenging to offer mitigation for the future flood risk scenarios presented. But, the options explored in the 5 bullet points in Appendix C are not considered robust or exhaustive. We expected to see at least one robust mitigation plan put forward within the FRA to address the increased flood risk associated with this proposal. Therefore, we are objecting on flood risk. However, if the Examining Authority are minded to recommend granting of Consent, then we propose that the Requirements suggested below are in place to overcome this unresolved concern of flood risk increases. We would recommend refusal without these Requirements:

#### **Requirement 1a**

Prior to commencement of the authorised development Phase A of a mitigation strategy setting out a plan to mitigate the increase in flood risk from the authorised development up to 2041 for an increase in the effluent discharge associated with population equivalent of 300,000 as set out in the Flood Risk Assessment (version 3, dated 22 March 2024) must be submitted to the Environment Agency. The authorised development must not be commenced before Phase A of the mitigation strategy is approved by the Environment Agency. The works approved in Phase A of the mitigation strategy must be constructed before effluent discharge associated with a population equivalent of 275,000.

#### **Reason**

To ensure that the proposed development will not result in any increase in flood risk elsewhere.

#### **Requirement 1b**

Prior to 2038 or prior to any increase in the effluent discharge to the River Cam associated with effluent discharge associated with a population equivalent of

300,000 whichever is the earlier Phase B of a mitigation strategy for the remainder of the lifetime of the authorised development to ensure that any further increases in flood risk are fully mitigated must be submitted to and approved by the Environment Agency. The works approved in Phase B of the mitigation strategy must be constructed before any increase in the population equivalent to 300,000.

**Reason**

To ensure that the proposed development will not result in any increase in flood risk elsewhere.

**Requirement 2**

Prior to commencement of the authorised development the undertaker must inform the affected landowners of Areas O and L as set out in the Flood Risk Assessment (version 3, dated 22 March 2024 - Point 4.1.19 and Appendix B figures 7 and 16) setting out the exceedance of flood levels and mitigation measures for Areas O and L and must send a copy to the Environment Agency.

**Reason**

To ensure that the proposed development will not result in any increase in flood risk elsewhere.

Should you wish to discuss this matter further please do not hesitate to contact me.

Yours faithfully

**Neville Benn**  
**Planning Specialist**  
**Sustainable Places**

Direct dial: [REDACTED]

Mobile: [REDACTED]

Direct e-mail [REDACTED]@[environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)