

Quy Fen Trust (QFT) – Closing Submission 12-04-2024

1.0 Introduction

Throughout the Examination process QFT has made the following submissions:

RR-034 Relevant Representation

REP1-166 Written Representation

REP4-104 Written Summary of oral submissions made at Issue Specific Hearing (ISH3)

REP6-132 Comments on Issue Specific Hearing 4 (ISH4).

This Final submission sets QFT's current position on the PD with reference to continuing concerns / disagreement.

2.0 Current Position

Quy Fen Trust (QFT) continues to object to the PD as submitted in RR-034 on the grounds of inappropriate development in the Green Belt, the high level of harm it will have on the purposes of the Cambridge Green Belt and with the view that 'the very special circumstances' to justify development have not been met. There is no operational need to relocate the WWTP and alternatives exist to accommodate the housing proposed without relocation of the WWTP or a new strategic site in the Green Belt above existing and or already proposed in the Greater Cambridge Local Plan. An employment led development at North East Cambridge with a smaller quantum of housing is a reasonable alternative.

2.1 Recreational Pressure, Use of Section 106 Agreement

QFT submitted at D6 (REP6-132) it was in support of the use of an S106 agreement as the formal mechanism for funding the Recreational Advisory Group Activities and advised the ExA that in response to a request from the Applicant, a formal request had been made for a funding package to include costs of mitigation measures QFT considered necessary.

These measures were detailed in REP6-132 and included funding to support signage in the wider area to divert pressures away from Quy Fen; the development and maintenance of an up-dated Quy Fen Website, approximate costs were cited £3000-£4000 plus VAT for development and circa £300-per annum plus VAT; high quality visitor information boards (Quy Fen has four entrance points); additional infrastructure requirements eg bin provision (dog and litter) and servicing e.g. part time warden during periods of high activity.

The communication was sent to the Applicant via the Chair of the inaugural Recreational Advisory Group and copied into all members of the Advisory Group on the 27-03-24. Quy Fen has not yet received an acknowledgement or response from the Applicant or other parties.

QFT did not have sight of the Applicant's Draft S106 agreement prior to its publication on the NSIP web-site on the 08-04-24 and notes in Schedule 3 a sum of £30,000 is specified as 'Recreation Group Contribution' and a sum of £5,000 specifically as an 'SSSI Mitigation Contribution', referenced as Stow-cum-Quy Fen.

Quy Fen Trust (QFT) – Closing Submission 12-04-2024

QFT finds the text ambiguous, it is not clear if the sum specified for Quy Fen includes the cost of signage in the wider area or is for expenditure specifically within the boundary of the Fen. It is evident however that the sum allocated for Quy Fen is not sufficient to cover the costs of the mitigation measures proposed by QFT in its communication with the Applicant; QFT had envisaged a sum in the order of £20,000 .

Further, the identification of mitigation measures is specified as the responsibility of the County Council (CCoC). However the CCoC is neither the landowner or manager of Stow cum Quy Fen SSSI, such that QFT proposes as an alternative the following:

“SSSI Mitigation Contribution” means the sum of £20,000 (Index Linked) payable to the County Council towards mitigating recreational impacts on the SSSI by way of signage, fencing, educational materials or such other measures as the County Council, advised by the Quy Fen Trust, considers appropriate.

In recognition of the timescales to D7, feedback on the draft S106 Agreement published [REP9-098/-099] has been provided to the Applicant on 10th April 2024 and is formalised herein.

2.2 Pollution

QFT has raised matters of pollution throughout its submissions in terms of risks associated with ground water and surface water drainage; in particular in relation to the Applicants’ Drainage Strategy of the use of an attenuation pond for surface water drainage and this feeding directly into Black Ditch detailed in REP4-104.

QFT notes in the up-dated Outline Water Quality Monitoring Plan (REP6-086 2.4.4;2.4.5) that long term operational monitoring of both ground water and surface water at the attenuation pond will remain sampled on an annual basis. As submitted, this frequency, particularly of the attenuation pond would seem insufficient in the event of contaminated surface water run-off reaching the pond at any time, given that in turn, the proposal is that the pond drains into Black Ditch. The latter remains a concern for QFT.

QFT has submitted that the scheme should ideally be designed to avoid any prospect of pollution impacts and notes the Applicants response to EXQ2 21.1 (REP5-111) in relation to the surface water drainage strategy and assurance requested there will be separation of ‘not at risk’ ponding areas from areas ‘at risk of contamination’. It is understood from the Applicant’s response that the ‘detailed design phase’ will address these factors.

QFT defers to the advice of the statutory advisors of Natural England and the Environment Agency on both these matters of monitoring and surface water drainage at this stage of the Examination and future ‘detailed design phase’ but remains concerned that protection of Quy Fen SSSI is not yet assured.

2.3 Landscape Impacts

QFT has submitted concerns the PD would have on the quality and visual amenity value of views from within Quy Fen and PROW network surrounding it, including the impact of lighting (RR-034; REP1-166).

Quy Fen Trust (QFT) – Closing Submission 12-04-2024

The principle mitigation measure the Applicant proposes to protect views of the WWTP are evidently the 5m bund, landscaping and planting. QFT notes the LERMP (REP6-066) proposes maintenance of mitigation planting post construction for a 'minimum of 30 years.' Given the critical importance of the tree planting to screen and filter views, QFT submit this is not sufficient and that the commitment to maintaining and replenishing mitigation planting should be 'in perpetuity' and or the 'life time of the WWTP'.