

Submission by Fen Ditton Parish Council ref ISH5

For 12 April 2024

This is FDPC’s submission at D7 with references to ISH5 – Traffic and Transport Agenda (EV-009a) and Action Points (EC-009b)

FDPC reaffirms its support to SHH and their submissions.

Reference	FDPC Response	References to Documents
<p>Agenda Item 2 b) – Modelling and Assessment of J34</p>	<p>FDPC noted that the Applicant reported, as referred to in Action Point 8, that more detailed analysis and mitigation was not required because the modelling shows the junction will operate at “less than 90 saturation”. FDPC supports Miss Cotton’s observation that the lived experience is that delays are frequent at this junction under present conditions. FDPC is concerned therefore that the modelling underestimates the likely future congestion. FDPC asked that the requirement remains that HGV access to the site during construction and operation does not take place in peak hours - not just because delay is the concern (mentioned by the Applicant) but because the junction is used as a route for commuting and, in term time, to school and fear and intimidation add to safety concerns. These points were raised by residents during consultation. FDPC objects to the phrase “if necessary” in para 4.3.20 of Chapter 19 because in this context it negates the requirement to avoid peak hours.</p>	<p>EV-009b Chapter 19 Traffic and Transport (REP6-037)</p>
<p>Agenda Item 2 f) – Policy 23</p>	<p>FDPC noted that ‘arrangements.. and/or signage’ are covered in the County Local Plan Policy 23 para 3.2.3. FDPC requested that in addition to the proposed geofencing, signage banning HGV access to the WWTW is placed at the entrance to High Ditch Road at the Newmarket Rd junction during construction and operation. In operation, signage banning entry by HGV exiting the WWTW should be placed on Horningsea Rd at the junction with the A14 on slip at the lights. This request links to para 4.3.20 of ES Chapter 19 Traffic and Transport. FDPC welcomes Action point 11.</p>	<p>Chapter 19 Traffic and Transport (REP6-037) EV-009b</p>
<p>Agenda Item 4-AOB Hedgerows</p>	<p>FDPC have inspected the revised DCO Hedgerow Plans (REP6-005) and welcomed the corrections made but noted there are still hedgerows in the Parish within the areas where land will be acquired or used (ie the Scheme Order Limits) that are not shown correctly. FDPC accepts confirmation from the Applicant that hedgerows wholly outside the Limits had been removed</p>	<p>Hedgerow Plans (REP6-005)</p>

	<p>from the Plans and that hedgerows crossing from inside to outside were still shown in their entirety.</p> <p>FDPC queried if areas of hedgerow and vegetation that could be retained could be protected through a mechanism under the LERMP.</p> <p>Post Hearing Note: Examples of possibly incorrect Hedgerow Plans are the inconsistency on Hedgerow Plans Sheet 3 where the hedgerow on the north side of Filly Lane is omitted whereas the Book of Figures – Biodiversity Sheet 8.6 (REP6-046) shows the same hedgerow with a small extent inside the Limits. Another example occurs where the vegetation running along the east side of Horningsea Road will be removed between points H5 and H6 but there appears to be 20m or more length with a 5m maximum width (these dimensional criteria are referred to in para 1.4.8 in Appendix 8.2: Hedgerow Baseline Technical Appendix) north of point H6 that has been classed as scrub rather than as a length of hedgerow bounded by scrub to its north.</p> <p>In view of the lack of time now available to check or ground truth the Plans, FDPC query if the Ecological Clerk of Works or others can be tasked with supervising the setting out of fence lines and reptile barriers to avoid unnecessary damage to existing hedgerows, trees or scrub vegetation.</p>	<p>Book of Figures – Biodiversity Sheet 8.6 (REP6-046)</p> <p>Appendix 8.2: Hedgerow Baseline Technical Appendix (REP6-063)</p>
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Reference	FDPC Response	References to Documents
<p>Applicants Comments on D5 Submissions FDPC - Parking and Staff</p>	<p>The Applicants response item 2.4 refers to a 1:2 ratio, a point FDPC did not make. However, FDPC has consistently objected to the provision of office space for staff not involved in site operations to a relocated WWTW.</p> <p>In response to ExA’s Q2, the Applicant stated in item 20.4 there are “30 No. Office workers using the facility daily (RES/WROL) and other AW staff such as Water resources”. Further to the questions by ExA at ISH3 on the sizing of the Gateway building, provision of parking and potential for severance of some office operations, ExA’s attention is drawn to the relative scale of the Cambridge STC’s proposed capacity to the Applicant’s overall regional sludge operations.</p> <p>The Project Description para 2.15.2 states the proposed works would have a capacity of 16,000 tonnes dry solids to allow for future growth to 300,000 PE. Data published¹ by the Applicant in the spreadsheet anglian-bioresources-market information indicates that the Cambridge STC produced 7104 tonnes dry solids in 2023. This amount is 6.7% of the total production as listed in that spreadsheet. Anglian Water’s 2025 – 2050 Bioresources Strategy² states on page 7 that they operate 10 STCs. Table 2 of the report includes their forecast sludge production for 2025 to 2030 as shown below:</p>	<p>Applicants Comments on D5 Submissions (REP6-115)</p> <p>ExQ2 Questions (REP5-111) Questions at ISH3</p> <p>Project Description (REP4-022)</p>

¹ <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.anglianwater.co.uk%2FSysSiteAssets%2Fhousehold%2Fabout-us%2Fanglian-bioresources-market-information-2023.xlsx&wdOrigin=BROWSELINK>

² [bioresources-strategy-2025---2050.pdf \(anglianwater.co.uk\)](#)

	<table border="1" data-bbox="582 300 1597 376"> <tr> <td></td> <td></td> <td>25/26</td> <td>26/27</td> <td>27/28</td> <td>28/29</td> <td>29/30</td> </tr> <tr> <td>Total</td> <td>TTDS</td> <td>162.419</td> <td>163.496</td> <td>164.114</td> <td>168.151</td> <td>173.104</td> </tr> </table> <p data-bbox="582 416 1731 592">It appears therefore that the Cambridge STC produced 6.7% of total sludge in 2023 and would produce less than 10% of the 29/30 production of sludge even if were to operate at its full long-term capacity in 2030. The clear implication is that the RES/WROL staff can cover the company’s sludge operations without being co-located at those 9 other STCs where 90% or more of the sludge is produced.</p> <p data-bbox="582 632 1731 663">FDPC hope that this data provides ExA with useful additional context to Action Point 7 from ISH4.</p> <p data-bbox="582 703 1738 879">FDPC welcomes the Applicant’s admission at ISH5 that the proposed WWTW was less satisfactory for access by public transport and for non-motorised access than the existing office at Milton House. Although workarounds on sustainability were discussed by the Applicant, FDPC suggest a more obvious solution is to not relocate and not provide office space for the RES/WROL and Water Resources staff.</p>			25/26	26/27	27/28	28/29	29/30	Total	TTDS	162.419	163.496	164.114	168.151	173.104	
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<p data-bbox="203 887 553 951">ISH5 and DCO Limits of Deviation at Outfall Structure</p>	<p data-bbox="582 887 1738 1129">At ISH4 FDPC expressed concern that raising the outfall structure by up to 0.5m above the current design elevation due to the allowance provided through the LoD could create additional flooding. In the post hearing submission (ISH4) under Water Resources, sub-para 6.1.2 the Applicant has confirmed that the flood model was too coarse to predict an impact from building the outfall structure. FDPC suggest this should not be taken to mean there will not be an impact but merely that the model reported in the Fluvial Modelling Report is too coarse to predict an impact from the proposed construction together with its allowance for LoD.</p> <p data-bbox="582 1209 1738 1348">As discussed in ES Chapter 20 Water Resources, page vii, a more detailed, local flow model has been recommended for further outfall design to assess scour. FDPC recommend that, as part of the future consenting process described on page 15 of Consents and other Permits, the Applicant and County, as LLFA, and Environment Agency review the velocity distribution across the main</p>	<p data-bbox="1767 922 1989 1023">Post Hearing Submission (ISH4) (REP6-118)</p> <p data-bbox="1767 1066 1989 1166">Fluvial Modelling Report (REP6-088)</p> <p data-bbox="1767 1209 1989 1278">Water Resources (REP6-039)</p>														

	channel and floodplain or otherwise conclude if there would be backwater effects from loss of cross section on the floodplain.	Consents and other permits (REP6-092)
ISH4 and Irrigation	FDPC accepts that the Applicant has considered the use of TSE and the need for a source of water when a drought order is in place as referred to in sub paras 6.2.3 and 6.2.3.	Post Hearing Submission (ISH4) (REP6-118)
ISH4 and Design Code Parameters for the Earth Bank	<p>FDPC welcomes the inclusion of a top width of 6m for the earth bank in LAN.02 in the Design Code. FDPC objects strongly to the approach proposed in LAN.02 for the elevation of the top of the earth bank. Although LAN.02 provides for the necessary survey of existing ground levels, by locating it along the bank's centre line it could lead to a reduction of the elevation of the top of the earth bank along the southern and western segments since the ground slopes away from the outer edge; the basis of the 5m minimum height shown previously. For example, if the ground falls at 0.05% under a 1:4 or 20m wide sloping face, this would reduce the required top of the earth bank by 0.1m compared to the previous definition of the ground elevation. Secondly, the last bullet point of LAN.02 points to a +/- 0.2m allowance but is unclear if this could lead to a 4.8m high earth bank in places or if the bund design to be submitted would show initial heights of 5.2m to allow for future compaction and construction tolerances.</p> <p>FDPC's submission at D5 contains our understanding of the elevation of the top of structures and the top of the earth bank. This shows that the number of structures and amounts visible above a vegetated earth bank are highly sensitive to the top elevation of the earth bank. FDPC has consistently objected to the reduction in the height of the earth bank from 7m to 5m; any further reductions should not be accepted.</p> <p>FDPC suggest the ambiguities described above are resolved at D8. Secondly, the top of earth bank elevations used in the photomontages should be included in the documents at D8.</p>	<p>Design Code (REP6-113)</p> <p>Fen Ditton (REP5-125)</p>