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FREEPOST CWWTPR  
Anglian Water

By email only

Our ref.

Date: 17 August 2021

Dear Sir/Madam

## **Cambridge Waste Water Treatment Plant Relocation (CWWTPR) Phase 2 Consultation**

Anglian Water commenced their second public consultation on the CWWTPR proposal on 23<sup>rd</sup> June 2021 and invited comments up to the 18<sup>th</sup> August 2021. This response is provided on behalf of South Cambridgeshire District Council (SCDC).

### **Proposed development**

The proposed development has been confirmed as a Nationally Significant Infrastructure Project (NSIP) by virtue of a section 35 direction by the Secretary of State. In line with section 37 of the Planning Act 2008 (as amended); this will require an application to be submitted for a Development Consent Order (DCO) to the Secretary of State.

The redline for the development that will be subject to the DCO encompasses the existing Cambridge Waste Water Treatment Plant (WWTP), the proposed WWTP, tunnel and pipeline corridors, waste water transfer tunnel, treated effluent transfer (including River Cam Outfall) and a Waterbeach transfer pipeline.

### **Site constraints**

The core site for the proposed WWTP is located south of Horningsea with the A14 on its southern boundary. The core site is within the Cambridge Green Belt and transected by a County Wildlife Site which follows a historic railway alignment.

## Comments

### *Principle of Development*

The Council supports the principle of the relocation of the Cambridge WWTP. The relocation will enable the realisation of the objectives set out in the emerging Area Action Plan that is being developed by SCDC and Cambridge City Council for the wider North East Cambridge development and which would facilitate the delivery of approximately 8,000 homes and 20,000 jobs. There remain some important issues that the scheme needs to address in more detail to accord with the South Cambridgeshire Local Plan 2018, the Cambridgeshire and Peterborough Combined Authority Local Transport Plan (2020) and other materials considerations. The development nevertheless provides an important opportunity to deliver an exemplar WWTP facility, in terms of innovative design, sustainability approach and use of technology and in relation to how it addresses other key planning policy objectives as set out below:

### *Sustainability*

The Council supports Anglian Water's objective that the new facility will be operationally net zero and seek to reduce embedded carbon during the construction phase. Achieving this goal will for a large part be dependent on the technological solution chosen. The opportunity to utilise natural processes to "polish" the treated waste water within the landscape should also be investigated further, both to improve the quality of the water released into the River Cam and to minimise the need for energy intensive processes within the plant. Notwithstanding this, where energy intensive processes can provide benefits that outweigh costs in terms of land-take, transportation or embedded carbon, these should be considered, especially in conjunction with renewable energy production. Proposals for energy generation and connectivity to local energy networks requires further detail to be provided to understand the feasibility. Opportunities for advanced treatment of sludge should be considered alongside the wider, beyond site environmental implications of sludge spreading. The Council would also expect annual HGV tonne-kms associated with sludge transport to be estimated and disclosed as part of the operations carbon cost assessment.

### *Landscape Proposal*

The landscape led approach is supported and the scheme presents the opportunity to provide valuable green infrastructure to the east of Cambridge. The presentation of a single landscape site masterplan option as part of the current consultation does not however allow consultees to comment on any alternative options that may have been developed and either discounted or which may have elements in whole or part that may have been more suitable.

The site is characterised as Fen Edge and a landscape proposal should be considered which respects and enhances the local character including Quy Fen, supports the Wicken Fen vision and contributes positively to the Cambridge Nature Recovery Network. The earthwork bund proposal, as designed in the single consultation option, on the basis of the material provided, appears at odds with the

existing Fen landscape and may require further work to ensure that it can respond positively to Local Plan policy objectives.

Typical landscape principles which should be considered in this context include linear drainage ditches, small scale pastoral fields, sparse woodland cover with small deciduous blocks, wet and species-rich grasslands, floodplain grazing marsh and shelterbelts. The landscape should be multifunctional providing amenity, biodiversity, carbon storage and SuDs.

In the context of the single landscape solution referenced above the proposal to install a structure on top of the earthwork bank is not supported and is not considered to be an acceptable approach nor does it maintain the openness of the Green Belt. Further consideration should therefore be given to include soft landscape options. The Council would suggest that the alternative treatment options are developed for further discussion and consultation, setting out the pros and cons of each option. The Council also notes that this is consistent with the views expressed by the Cambridgeshire Quality Panel at their meeting on 14 July 2021.

Anglian Water have outlined that 'going forward from 2050 and beyond, the facility will have the flexibility to adapt and evolve within the proposed footprint as new technologies or treatment opportunities present themselves'. It would be helpful to clarify that there is sufficient space available for expansion (if required) within the confines of the permanent fixed earthwork bank.

The potential reuse of tunnel spoil within the landscape is however welcomed, given its potential to limit vehicle trips.

### *Vehicle Access*

The three vehicle access options have been noted and the strong preference of the Council is for the operational traffic to utilise a direct access from the A14 (Option 3). This will avoid the use of local roads and junctions for HGV traffic helping manage traffic congestion. It will also enable pedestrian and cycle priority for local site access avoiding any conflict with HGV movements. It is appreciated that further detailed discussions will be required to explore this further, including with Highways England and Cambridgeshire County Council.

### *Sustainable Transport Access*

Further work is needed on the strategy for providing cycle and pedestrian access to the site to utilise the discovery centre, parkland and walking/cycle routes. The project presents an opportunity to enhance access to the countryside. A route along the former railway alignment that passes through the centre of the site should also be considered further given the direct extension to existing Cambridge cycleways that this could provide including connectivity to the Marleigh development. In addition, the use of Option 3 for main vehicle access would allow Low Fen Drive Way to be prioritised for pedestrian and cycle access.

### *Technological Solution*

The Council's firm view is for an exemplary WWTP facility to be delivered utilising the best available technologies. Technology options have not been presented as part of the consultation process and the method proposed has not been suitably justified. The method chosen has implications for the size of the site, sustainability and power generation potential, odour and the scale of structures such as the digester tanks. The Council therefore seeks further information regarding these matters and an assessment of the best technological solution.

### *Biodiversity*

The commitment to provide only 10% biodiversity net gain which is a minimum requirement being put in statute<sup>1</sup> is very disappointing. In terms of delivery of an exemplar project, the proposal should be making the highest possible contribution to Biodiversity Net Gain delivery and the Council believes that there is scope to achieve this. SCDC has pledged to Double Nature<sup>2</sup> and has set an aspirational 20% Biodiversity Net Gain ambition, a target which it expects partners to meet, particularly on high profile exemplar projects. The site represents a unique opportunity to do this given the connectivity to a County Wildlife Site and the current intensive agricultural use.

### *Odour*

The proposed development will need to undertake odour modelling in line with statutory guidance. This should include an odour assessment of either the current or similar proposed site and modelled in line with meteorological conditions to assess the affects the development may have on existing receptors. Information is also required on whether any septicity may take place in pipes which direct the waste from the existing sewage works to the proposed site and how this may be mitigated (if necessary).

The site proposes a variety of green open space with footpaths and bridleways although no information has been provided on the protection these areas would have from offensive odour that may impact their attractiveness and usage.

### *Implications for the aquifer*

The opportunity should not be lost to consider how the new plant could contribute in the future to wider strategic plans to introduce greater water re-use. We would like to see multi agency cooperation, particularly with Cambridge Water, to ensure that no opportunities are precluded that could lead to increased water re-use in the future.

### *Further Details of pipeline, shafts and outfall*

Further details are required on the pipeline works and outfall structure proposed to the

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<sup>1</sup> Environment Bill which introduces a new Schedule 2A to the Planning Act 2008.

<sup>2</sup> SCDC Doubling Nature Strategy 2021.

River Cam to be able to comment on the appropriateness of the works. The discharge chamber adjacent to the River Cam should include suitable landscape and material finishes and not be simply exposed in situ concrete or pre-cast concrete as this does not reflect the rural landscape characteristics.

### *Noise*

Further discussions and assessments will be required in relation to potential noise impacts on surrounding residential communities arising from the development. These issues can be considered further under the EIA Scoping process.

### *Heritage*

A detailed Historic Environment Assessment plan has been prepared by Mott MacDonald which has highlighted the potential impact on the Grade II\* Biggin Abbey and potentially Fen Ditton Conservation Area but that the extent of that impact will be dependent on the final design.

The report also states that the mitigation factor which will have the greatest effect on reducing potential impact on surrounding heritage assets is the design, height and massing of the plant. It refers specifically to the position and reduction in height of the digesters and that all other buildings over 10m should be reduced in height and mass wherever possible. Detailed plans or designs of the plant itself are required to fully assess the potential heritage impact. Early engagement with the Council on design options and choices is therefore requested before the proposals are finalised.

### **Next steps**

The Council looks forward to working with Anglian Water to address the key landscape and biodiversity issues in particular but also to develop a better understanding of the sustainability issues, including sustainable transport solutions and technological solutions in advance of the formal consultation process early next year. The EIA Scoping process will also provide an opportunity for discussions on the technical issues highlighted in this response.

I trust, nevertheless, that in the meantime, these comments will be taken into account but please do not hesitate to contact me if you require further clarification on any of the matters raised.

Yours sincerely,

Stephen Kelly

Joint Director of Planning and Economic Development  
On behalf of South Cambridgeshire District Council