

# FEN DITTON PARISH COUNCIL

Cambridge Waste Water Treatment Plant Relocation  
[info@cwwtpr.com](mailto:info@cwwtpr.com) by email

27 April 2022

**Dear Sirs,**

## **CWWTPR Stage 3 Consultation - FDPC Response**

Please find attached our response to the above consultation. In summary Fen Ditton Parish Council (FDPC) OBJECTS to the proposed development at Site 3 at Honey Hill and the outline design of the works and mitigation proposals as described in this consultation.

This response should not be construed as the Council's acceptance of either the proposed move or the methodology of and final site selection by Anglian Water (AW) described in previous consultations and the outline design of the works and the mitigation proposals described in this consultation.

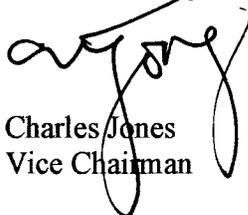
Our response details are given on the following sheets since there is not room on the original consultation paper for all the material we wish to add. A summary of the original questions is given to aid readership and FDPC responses are given in italics.

Our additional response material is given in the attached document 'Summary Responses to AW on Proposed Works and Mitigation'. This includes points where information is missing and indicates performance and design changes or the minimum additional mitigation measures which are needed.

As a general point, we would welcome early sight of information requested or missing from the PEIR. We look forward to further engagement with AW's overall development of proposals for design and mitigation as there is a such a wealth of local knowledge available. Ignoring this until the final submission by AW would be a wasted opportunity. We would like to express our thanks to you for the opportunity to contribute to the briefing sessions with some of your consultants after the previous consultation.

We look forward to hearing from you.

Yours faithfully,



Charles Jones  
Vice Chairman

c/c Sarah Smart;

# FEN DITTON PARISH COUNCIL

Parish Clerk  
Fen Ditton Parish Council  
email: [clerk@fenditton-pc.org.uk](mailto:clerk@fenditton-pc.org.uk)

C/C Lucy Fraser MP  
Daniel Zeichner MP  
Mayor Nik Johnson  
Councillor Anna Bradman CCC  
Councillor Claire Daunton SCDC  
Councillor Graham Cone SCDC  
Councillor John Williams SCDC  
Councillor Alex Bulat CCC  
Councillor Naomi Bennett CCtyC  
Councillor Hannah Copley CCtyC  
Councillor Haf Davies CCtyC  
Horningsea Parish Council  
Lode Parish Council  
Stow cum Quy Parish Council  
Teversham Parish Council  
Waterbeach Parish Council  
Trustees Quy Fen Trust

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## Detailed Response to CWWTPR Consultation 3, February-27 April 2022

### General

This response should not be construed as the Council's acceptance of the proposed move or the methodology of and final site selection by Anglian Water (AW) or the design and proposed mitigation. Many of the points made in our earlier responses to previous consultations still apply and should be taken into account in the current consultation.

The current consultation focusses on the outline design of the works and the mitigation proposals.

The text below follows the numbered questions in AW's consultation paper in order to facilitate your enumeration of answers. A summary of the original questions is given to aid readership. FDPC responses are given below in italics although the supporting material is usually to be found in the attachment to this letter.

Registration Details;  
Mr Charles Jones, Fen Ditton Parish Council,  
Charles.Jones@Fenditton-pc.org.uk

### Q1 – Interest:

*Local Representative – as above,*

### Q2 Newsletters:

*Yes please, by email with c/c to Parish Clerk*

### PART A

### Q3 – Carbon Emissions

*Please refer to Section 12 in the attached in the context of the remainder of the other sections.*

### Q4 - Gateway

*Strongly Oppose*

### Q5 – Gateway - comments

*Please refer to Section 2 in the attached in the context of the remainder of the other sections. We support the Gateway no longer being a “statement feature” but consider the Gateway should be separated from the Discovery Centre and give 3 alternatives for the latter, including omitting it. Our landscaping and structure proposals will help further disguise the Gateway.*

### Q6 - Odour

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*Please refer to Section 10 in the attached in the context of the remainder of the other sections. We would welcome the opportunity to see the Draft of the Odour Management Plan and we expect it to include the information we have identified as missing and additional study that we have proposed.*

### **Q7 – Odour – Other Comments**

*Please refer to Section 10 in the attached in the context of the remainder of the other sections. Our overarching concern is that mitigation should prevent odour being detected at all residential properties including those circumstances beyond the 98 percentile suggested in your consultation material*

### **Q8 – Discovery Centre**

*No.*

### **Q9 – Discovery Centre - discussion**

*See our response to Q5 above which notes we consider the Gateway should be separated from the Discovery Centre and give 3 alternatives for the latter, including omitting it. AW should not divert HIF funds for its own self-advertisement and image enhancement and present this as mitigation.*

### **Q10 – People and Nature**

*No.*

### **Q11 – Woodland and Grassland**

*No*

### **Q12 – Landscaping Proposals - discussion**

*Please refer to Section 8 in the attached in the context of the remainder of the other sections. This is a subject that affects many of the other topics and covers a wide area. Our overarching concerns are that mitigation should minimize the visual impact but also that people do not degrade the more precious aspects of the local ecology.*

### **Q13 – Photomontages -Horningsea Road**

*No*

### **Q14 – Photomontages -Fen Ditton**

*No*

### **Q15 – Photomontages -Low Fen Drove**

*No*

### **Q16 – Visual Intrusion and Photomontages**

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*Please refer to Section 8 and its supporting Appendix in the attached in the context of the remainder of the other sections.*

### **Q17 – Access to Green Spaces**

*No*

### **Q18 – Recreational Initiatives**

*We stress the importance of this area as the population increases in the nearby area as we refer to in Section 16 in the attached in the context of the remainder of the other sections. We have been asked by residents if the concept of a rowing lake west of the River Cam has influenced the choice of a longer route east of Horningsea for the Waterbeach. We are concerned about anti-social behaviour. See also our response to Q12 above.*

### **Q19 – 4 Arm junction at J34**

*Please refer to Section 7 in the attached in the context of the remainder of the other sections. We stress the importance of keeping all traffic related to the proposed site out of village centres and off the small country roads. These considerations inform our conclusion that Option 3 is the better solution than 1B.*

### **Q20 – Travel Plan**

*Please refer to Section 7 in the attached in the context of the remainder of the other sections. We stress the importance of reducing the number of trips by HGV and other vehicles travelling to and from the proposed site.*

### **Q21 – CTMP**

*Please refer to Section 7 in the attached in the context of the remainder of the other sections. We stress the importance of reducing the number of trips by HGV and other vehicles travelling to and from the proposed worksite and the importance of bring the permanent access into use to avoid use of Low Fen Drove. We have suggested elsewhere that excavated material from pipelines and tunnelling sites should be used near to its point of origin rather than all being transported for inclusion in the bund.*

### **Q22 – CoCP**

*Please refer to Sections 11 and 14 in the attached in the context of the remainder of the other sections.*

### **Q23 – Other Mitigation**

*Please refer to our conclusions on alternative layouts in the attached in the context of the remainder of the other sections*

### **Q24 – Support to the developed design**

*Strongly Opposed*

**Reasons?**

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*Please refer to the attached. Our overarching reason is that the developed design is too disruptive and intrusive. This appears to reflect a lack of proper consideration of alternatives.*

### **PART B**

#### **Q25 – Consultation Contact**

*Other – FDPC has been made aware of this consultation through all the means lists and has benefitted from advance notifications from the AW Team and District Councillors.*

#### **Q26 – Consultation Methods**

*Yes*

#### **Q27 – Consultation Information**

*Quite Informative*

#### **Q28 – Consultation Suggestions**

*Please refer to the attached with regards to the information we consider to be missing.*

*We draw your attention to our concern made previously that you have received a large number of responses from previous consultations by email or at the Freepost address but you have not attempted to contact those who live outside the postcode areas of the letter drop. With the reductions in travel during COVID, people from outside the letter drop area may still be unaware of this consultation. We have also sensed respondent fatigue due to the iterative nature of the consultations on CWWTPR and overlap with other major planning and transport consultations but we cannot offer any suggestions as to how to overcome this. Residents have also complained to us about the delay in getting some answers, receiving additional information, technical glitches in electronic platforms and the ambiguous nature of some of your questionnaires. You might consider if these points had been adequately independently tested beforehand #.*

#### **20 – Were our Views Considered?**

*Don't Know.*

*The point being that there are a few instances where we can see that you have definitely taken on board a point we have made; examples include the investigation of Access Option 3 and the inclusion of hiptomenerae in the baseline as reported in an Appendix 2. However, there are other cases where the outcome is either unattributable or is attributed to others without reference or separate response to any view we have expressed.*

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## SECTION 1 – SCOPE OF PROPOSED CWWTPR WORKS

### 1) Capacity

#### 1.1 Waste water treatment (WWTW)

AW have reported elsewhere that the existing effluent treatment works capacity is 200,000 PE. The CWWTPR documents show AW propose to build a plant with an enlarged effluent treatment capacity of 275,000PE to last until at least 2041 and with a possible additional 25,000PE capacity needed to be built in the late 2030s to serve until 2050 but AW can't project beyond that. Our calculations suggest growth from 2020 to 2041 to 275,000 equates to 1.75% per year as a compound rate increase. Taking an approach similar to Water Resources East (who report to 2050 already), we project below at different rates to see when a 300,000 WWTW would reach its limit. Growth from 275000 to 300000 in population terms would take:

18 years at 0.5% annual growth in population (very low rate)

12 years at 0.75% annual growth in population (low rate)

9 years at 1% annual growth in population (moderate rate)

8 years at 1.25% annual growth in population

All in all there is little prospect that if the projected 275,000PE capacity is needed in 2041, then an expansion to 300,000 would be enough to last much beyond 2050 unless there is drastic reduction in population growth from current or anticipated rates. Therefore, in the mid 2040's (within 15 years of opening) our communities would be faced by pressures to extend the works outside the bund or an additional works will be needed elsewhere. Although AW have stated on 19th April 2022 that all structures for expansion to 300,000PE would take place within the proposed bund, FDPC would like to see also a commitment that there would be no expansion outside the bund within a minimum of 40 years of opening.

In the discussion on 19th April AW noted that calculations are usually based on volumes of effluent flow requiring treatment rather than actual populations. However, AW also stated future treatment capacity, based on the proposed methods, is contingent on per capita water use dropping from current values. Our objection is that this assessment of future capacity is thus dependent on water supply reduction measures that are outside AW's control since it is Cambridge Water who supply most, if not all, the customers in this sewage catchment.

We conclude that this proposal to build the WWTW at this site in the Green Belt is a relatively short term solution and this Consultation does not make this point clearly enough.

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## 1.2 Sludge treatment centre (STC)

AW have previously and elsewhere stated that the works would serve over 500,000PE when opened. This much higher figure for population served is due to sludge being imported from smaller works that lack sludge treatment facilities. It therefore appears that the existing STC serves a population at least 2.5 times greater than the current WWTW serving the Cambridge catchment.

AW have replied to a resident's query on sludge imports that "...the current import limit is approximately 600m<sup>3</sup> per day and an import limit will also be placed on the new facility".

Understanding that there is a relationship between HGVs trips and sludge imports, please confirm:

- what approximate import limit on sludge imports AW envisage when the new the works opens and in subsequent decades;
- that this figure is incorporated in predicted HGV usage;
- how much sludge is produced at the current works; and;
- how much sludge they expect to produce at the proposed works.

Please note our concerns about STC capacity are not just based on traffic but include the visual intrusion and odour issues AW document elsewhere.

## 1.3 Stormwater

AW state in the PEIR Introduction that the Environment Agency has proposed stormwater storage of 23,000m<sup>3</sup>; the same amount as at the existing works. The Scoping Report indicates that a surface tank would provide some 19,000m<sup>3</sup>. In principle, the tunnel could provide some additional storage and the treatment function would further attenuate storm flows. PEIR - Climate Resilience p17 states "... will together attenuate future storm flows at 68 litres per day"; this is clearly nonsense since it is less than 4 good bucketfuls a day.

AW quote an @One Alliance report to justify the planned stormwater provision. This document has been requested for inspection by FDPC.

FDPC objects to the proposal to replicate the existing storage provision because:

- The addition of existing Waterbeach flows and, although attenuated by SUDS, flows from the new Waterbeach and other developments in Cambridge such as Marleigh will substantially increase inlet flows; and
- The planned system is supposed to be designed to the future 1:100 year plus 25% event and serve a population of 275, 000PE whereas the existing system may not have this design capacity.

In our response of 9 Aug 2021 to the version of the HIA dated March 2021, we noted: "It appears the proposed relocation could, in principle, transfer the consequences of system failure from a location at the Milton works to land and water resources in the area

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of Site 3, including the Black Ditch and Quy Fen SSSI. AW has described in previous webinars how they intend to design to a fairly rare rainfall event with an allowance for climate change and how back up systems for pumps, power supplies and discharge pipelines will provide some resilience of the system. However, there will nevertheless be a residual risk of system failure and so we consider that AW should provide details of how they would manage an event beyond their design standard". From the current consultation and recent data on overflows, it appears AW rely on the Riverside to manage excessive flow in the Cambridge catchment.

The current proposal introduces a new mechanism of effect to transfer pollution risk to the proposed site since the Waterbeach transfer was not covered in the HIA. The current proposals do not appear to include a Combined Sewer Overflow (CSO) at the proposed Waterbeach PS. It follows that the PS will be expected to pump to the proposed new works irrespective of any system failure at the receiving end and thus increase the likelihood of polluting the Black Ditch and downstream receptors. System failures at Waterbeach would merely flood the upstream residential area. From recent data on overflows, it appears AW rely on the tankering and sewage flooding in residential areas to manage excessive flow in the Waterbeach catchment.

FDPC object to the absence of any form of emergency escape or CSO which is required at the Waterbeach PS in which case the Scope of EIA should be extended to cover the receiving watercourse system managed by the Waterbeach Level IDB unless AW come up with an alternative design.

Overall, FDPC are deeply concerned that the stormwater provision will be inadequate (see also our response on Climate Resilience below) and would not work under conditions of system failure and may request the Environment Agency to re-examine the issue.

### **2) Structures**

Proposed heights and footprints of structures inside the bund were documented in the Scoping Report. Some current proposed heights are listed in the PEIR - Landscape and Visual Amenity report which shows the max height of the STC digesters has been lowered from 26m to 20m above local ground level. In discussion of 19th April AW confirmed that the numbers and maximum heights of other structures given in the Scoping Report are still current and have been carried through to the visualisations.

The Scoping Report also states that many of the tanks in the WWTW will extend to 6m or 8m below finished ground level. FDPC note this is a welcome contribution to the possibility of a number of tanks becoming out of sight were the landscaping proposals revised appropriately.

The current consultation documents suggest the Operations offices and staff facility have been transferred from the Gateway/Visitor Centre building and combined with the other

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office and parking area. On 19<sup>th</sup> April, AW reported they propose parking for 61 cars inside the bund plus 10 smaller vehicles and two coaches outside the bund. This was confirmed in an email to a resident on 22<sup>nd</sup> April.

FDPC have requested details of:

- the numbers of office buildings and office spaces and car parking spaces now proposed and how these numbers are justified and how they compare to the existing Sewage Works complex at Milton;
- the height and footprint of the proposed Workshop, how these dimensions are justified and how they compare to workshops in the existing Sewage Works complex at Milton.

In the absence of any other tabulation, we have summarized the information given on maximum structure heights (excluding lighting) as shown below:

Section of Works	Nr of Structures	Height Range
WWTW	27	8m or less
	1	11m
STC	8	12m to 14m
	19	15m to 18m
	2	20m
Boiler Vent Stacks	2	24m high 2m dia.
Offices etc	2	10m
	2	11m and 13m

Although this this summary does not contain information on the width of structures near roof level, it indicates clearly how the waste water treatment structures could become virtually invisible with provision of a suitable bund (embankment) height of 7m or more with nominal hedging on top whereas the sludge treatment centre structures are generally taller and their mass would still be partially visible even after trees are established. Reducing the area given over to offices would also reduce the visual impact. We consider the Discovery Centre and associated car park should be located inside the bunded area or omitted. Another alternative would be to incorporate a Discovery Centre at the site of the Cambridge Museum of Technology on Riverside.

### 3) Lighting

The PEIR - Landscape and Visual Amenity report states that lighting would be directed downwards and not switched on continuously. The Scoping Report states that roads and carparks would be continuously lit and that columns would be up to 15m high. A full assessment of lighting, with nighttime visualisations, will be submitted in relation to PEIR Ecology.

FDPC will object if the height of the continuously lit lighting columns on roads inside the bund is such that the light is visible outside the bund. We request AW prioritise the use of movement controlled lighting in office buildings or car parks inside the bund. If our objection to its siting is not taken up, we have no objection to the Gateway/Discovery car park not being continuously lit since AW stated on 19<sup>th</sup> April that this area would be

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supervised by operations staff. We also welcome AW's comment that the proposed extension of highway lighting on Horningsea Road between Low Fen Drove/Biggin Abbey turnings and J34 would be re-examined and possibly curtailed.

### **4) Bunding**

The current consultation docs refer to a bund height of 5m to 7 m. Previous documents referred to height of 7m. AW stated on 19th April that excavated material to create the bund would come from tunnelling and pipeline spoil and from land lowering and excavations inside the bund but not from land levelling or lowering outside the bund and that the bund height would be measured from land levels outside the bund. Our response on bund height is given elsewhere.

### **5) Tunnel and Pipelines**

The consultation documents show the main connecting tunnel running in a straight line from Shaft 3 to Shaft 5 with Shaft 4 as an intermediate reception shaft to suit the proposed pipejack method of construction. The southern section of the Waterbeach pipeline is shown passing the proposed treatment works, under the A14 then westwards south of Poplar Hall Farm and Red Close Cottage before crossing under the River Cam and into the existing Milton works off Cowley Road.

FDPC objects to these alignments and considers it should be possible to reposition Shaft 4 to be equidistant from these residences or to improve the tunnel methodology and omit Shaft 4 altogether.

FDPC also objects to the possible vent shaft at Shaft 4 and considers this should be omitted or relocated to the western side of the Cam.

FDPC request that AW:

- Explain why AW has not chosen to align the Waterbeach pipeline in the land between Biggin Abbey and the A14 containing the proposed outfall pipelines thus avoiding any pipeline works in the sector east of the river Cam and south of the A14. Q1);
- Explain why a more direct and shorter route from Waterbeach to the Milton Works was not chosen rather than the current alignment east of the River Cam and Horningsea village.
- Confirmation that AW intend to arrange supply of precast tunnel and shaft segments or rings from offsite manufacture and not from a casting yard inside the redline boundary.

### **6) Land Take**

The consultation documents show a large area of land within the red line boundary. Much of this is valuable farmland and is used for food production. FDPC considers the proposed land take is both excessive and in need of adjustment to match some of our other objections and suggestions. We draw attention to:

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- The lack of proposed use of the majority of the field east of Horningsea Road and south of the A14. The unused area should be excluded from the red line boundary;
- The merit of removing the proposed eastern connection path between the proposed work and Low Fen Drove which severs the County Wildlife Site (CWS);
- Our suggestion to substitute a more northerly connection from Low Fen Drove and exclude the former railway line from the red line area;
- Subject to landowner agreement, modify the red line boundary alignment on the northeast side of the works since the current arc narrowly misses an o/h pylon and leaves at awkward re-entrant corner by the CWS. This decreases the scope for arable operations just outside the current red line boundary;
- Possible use of land west of the Cam and north of A14 opposite Biggin Abbey to accommodate a realigned river crossing and route to the existing works for the Waterbeach pipeline;
- The recently awarded planning permission for change of use of the Old Barn on Low Fen Drove. We suggest this parcel should be excluded from within the red line boundary; and;
- The need to show how much land will be taken permanently.

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## SECTION 2 – PROPOSED MITIGATION and PEIR SECTIONS

### 7) Traffic:

The proposed Option 1B is much less satisfactory than Option 3 from the point of view of residents and further mitigation is required to avoid HGVs and cars passing through the village centres. Reducing the number of vehicles using the site will reduce congestion at J34; we have questioned the numbers of visitors and offices above. We understand that further detailed design is underway and that a sharp nosing/corner is proposed on the north west corner of the proposed 4 way junction to dissuade drivers from using Horningsea Road north of the junction. A traffic management plan supplemented by ANPR cameras would give AW control of its own HGV usage.

FDPC considers extra mitigation is required and should include:

- At the proposed Option 1B junction – Legally enforceable:
  - No Right Turn into the works from Horningsea Rd northbound,
  - No Left Turn into the works from Horningsea Rd southbound and
  - No Right Turn at the works exit onto Horningsea Rd.

Together, these would prevent traffic passing through the villages along Horningsea Rd or using Low Fen Drove to access the works and also passing through Horningsea Village and Low Fen Drove on leaving the works.

- Commitment to model overall traffic performance with historic data as a baseline and not rely on AW surveys since these were at a time when traffic into Cambridge was below historic levels;
- PC representation on the Consultation panel overseeing the traffic measures;
- Commitment to provide all AW and vehicle drivers with a single postcode point of references for the main site or temporary worksites. This will avoid drivers making ad-hoc satnav decisions to try and find their way to satellite sites and end up on village roads such as Green End.

Our questions related to Traffic are:

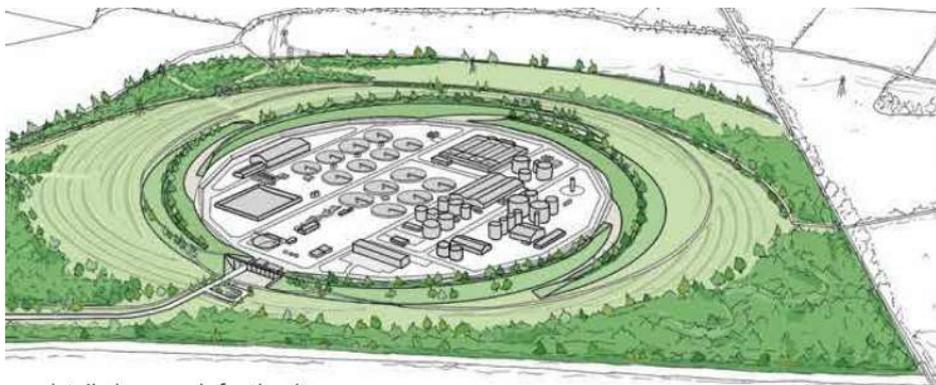
- Q1) Please provide us with a copy of the highway safety audit noted in the Non-technical Summary 3.4 Vehicular access and the supporting information for its Vehicular Access evaluation;
- Q2) Please confirm existing routes / source destinations for sludge lorries and any additional routes that will be introduced for the proposed plant;
- Q3) Please advise the number of and non-operational office staff and the number of visits / visitors to the current works either annually or monthly.

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## 8) Landscape and Visual plus Lighting

### 8.1 The Core Site

The PEIR and Consultation documents show a stark contrast between artists' impressions and the visualisations.



The scale of the build and nature of the landscaping problem is clear from the PEIR visualization from the A14 viewpoint.



Extra mitigation is required and should include:

- A commitment to raise the embankment bund height by at least 2 m to a minimum of 7m above existing, external ground level
- A commitment to provide on top of the bund, denser planting of semi mature trees as well as saplings and hedging and a possibly wire strand fence capable of supporting creepers like honeysuckle etc;
- A commitment to plant the screening on the bund as soon as possible after the bund is completed which will be many months before commissioning of the proposed plant is finished;
- Consider an early phase of tree planting in the tree belt along the A14. This could be widened later if adjacent land is to be used during construction. The aim should be to mirror eventually the existing screening at the Milton sewage works.

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Our questions related to Landscape and Visual issues are:

- Q4) Please provide us with a copy of the advice AW received from independent design experts, in particular from the Design Council Panel and, if AW are using them, the Cambridgeshire Quality Panel;
- Q5) Why is the street lighting planned to continue north along Horningsea Road as far as Low Den Drove from the proposed, permanent access at the J34 on the A14?
- Q6) Please provide additional winter, night time visualisations including a set with the lighting that will be permanently switched on and taking account of the glare reflected of the structures.
- Q7) Please provide details of how the proposed finishes of the exposed structures will be 'designed to minimise their prominence in the landscape'. There is no reference to the materials or finishes on which FDPC or our residents can comment or be assured by.

## 8.2 Offsite

The PEI Landscape and Visual Amenity report reviews the Landscape Character, Strategic Green Infrastructure and Green Belt and considers the impact on the nearby villages. This forms the basis for the PEI assessment of the impact of the Proposed Development on Landscape Character and Visual Amenity and informs the offsite mitigation measures currently proposed by AW.

Appendix 1 contains a review of AW's material and has been prepared by a resident before inclusion in the consultation response submitted by the Save Honey Hill community group. The review reflects the huge effort put into identifying how many other public viewpoints and conservation interests will benefit from offsite planting. Clearly this need may reduce in places once AW have decided on finishes and improved the proposed bund height and on-site planting as we note elsewhere in our response.

FDPC fully supports the recommendations contained in the Appendix and considers that:

- these should be treated as either demonstrating the need for further information or additional mitigation;
- As a general point, we would welcome the chance for further involvement in AW's overall development of proposals for offsite impact assessment and design of mitigation as there is a such a wealth of local knowledge available. Ignoring this until the final submission by AW would be a wasted opportunity.

## 9) Noise and Vibration:

The PEIR and Consultation documents papers show noise and vibration will have the greatest impact during construction. Some operations, including HDD and tunnelling are described as requiring 24hr working. The issues will be managed through the CoCP and CTMP and permissions will be sought from the LA under the Control of Pollution Act unless this regulation is disapplied. It is recognised that some operational noise will occur. On 19th April AW indicated that predictions of operational noise were based on conditions without landscape planting in place.

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Extra mitigation is required and should include:

- A commitment to informing residents and PCs of the approvals sought from Local Authority under Section 61 of the Control of Pollution Act (CoPA) or alternative consenting regime.
- A commitment to providing noise insulation at properties affected by 24hr operations at HDD sites etc and close to construction sites such as the Discharge Works;
- A commitment to reducing noise from night time operations by postponing deliveries/spoil removal to engineering hours and minimising use of reversing alarms at night.

Our questions related to Noise and Vibration are:

Q1) Please provide us with a copy of the report on baseline noise measurements;

Q2) Not used;

Q3) Please give an assessment of the combined effect of baseline and operational noise.

### 10) Odour:

Odour is a major concern for residents and our experience is that Milton sometimes smells in the village despite being outside the modelled zone of detection. AW's approach is to control the source term at the works and achieve a 'negligible' effect on all known receptors from odour impacts, as defined by the Institute of Air Quality Management (IAQM). On 19th April AW replied that this is defined as 98% compliance under normal operations and thus exclude emergency/out of design conditions. In addition, design models use the worst of five years on record and do not account for future temperatures and wind speeds. Odour will be strictly controlled through an Odour Management Plan, required under the Environmental Permit for the site. Decommissioning at Waterbeach and Milton will be considered. Mitigation is proposed at vent shafts.

AW state that preliminary modelling for the proposed WWTP illustrates that odour effects will be unlikely to extend beyond 600m from the Draft Scheme Order Limits.

Given that the model leaves an average of around 6 days per year with conditions worse than the model inputs and excludes emergency/out of design conditions, FDPC considers AW should reverse model odour spread to predict and report how much the wind speeds or source terms would have to increase for 0.75 and 1.5ou detection limits to be breached at the 600m zone and at residences including Musgrave Way, High Ditch Rd, Marleigh, Horningsea and Biggin Abbey some of which are within AW's mapped 1km zone.

In addition, although the wind rose for Cambridge Airfield and Mildenhall (2020) looks plausible the ES should include a comparison of the modelled wind speeds and those in a

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longer term data span in case the former has missed the strong south easterlies or the north easterlies and north westerlies that sometimes occur.

## 11) Biodiversity

### Operational impacts on biodiversity

Anglian Water aspire to increase biodiversity in the long term by "...creation of new extents of hedgerow and new woodland and grassland habitats " and "...deliver a net gain of at least 20% for both habitat and linear features (hedgerows)" (PEIR Summary) although the main text refers to a minimum of 10% (PEIR P35 for example). This would be achieved by taking a large area of fields around Honey Hill out of arable farming and managing it differently to increase potential biodiversity once the works are operational.

The preliminary calculations of BNG used the Biodiversity Metric 3.0 tool, a Natural England methodology, to 'score' for different land uses such as woodland, hedges and grassland. In addition, AW recognise the existing Low Fen Drove Way Grasslands and Hedges CWS and propose to use some of the land within the red line boundary to extend the types of habitat benefitting plants, insects and animals found in the CWS. Further improvements to the CWS might include clearing scrub and installing bird and bat boxes.

Habitat proposals are shown on P31 and P32 of the Landscape, Ecological and Recreational Management Plan (LERMP). These three topics are inextricably linked since the landscaping proposals aim to provide multifunctional benefits including landscape visual screening and recreational opportunities as well as a legacy of a more biodiverse environment.

AW describe how their proposals are complicated by:

- some potential to cause harm and adversely affect biodiversity. Harm to existing species could result from a variety of causes such as increased predation from gulls and raptors or insectivores, disturbance due to vehicles and lighting, increased access to the CWS by people and pets;
- harm from physical disturbance to build the works;
- harm from physical disturbance to implement the landscape and recreation mitigation – in particular the risk to the CWS if the track bed along the former railway is altered;
- need for rodent control and other chemical use around the works;
- potential for contaminated runoff passing to watercourses outside the bund;
- the need for other stakeholders and land owners to agree to some of the proposals.
- The mitigation proposals are further complicated by the licensing obligations for individual species such as badgers, bats and voles whereas many other species are covered by more general legal requirements.

The PEIR volume 'Invertebrate Survey 2021' notes the sighting of the "IUCN 'Near Threatened' species, Variable Damselfly *Coenagrion pulchellum*". The volume includes in Appendix 2 *Hyptomena* previously recorded by others but not seen in the 2021 field

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surveys. As FDPC advised in our letter of 11/9/2020, some *Hyptomenera* have been classed as Endangered, Vulnerable or Rare.

The complexities of different systems of classifying scarcity are described but the overall conclusion is that the CWS and Low Fen Drove contain “..an impressive fauna by any standards”.

The LERMP para 4.1.5 states “Those biodiversity elements which contribute towards the 20% biodiversity net gain target set by Anglian Water for the project will be maintained for a minimum of 30 years...”

### **Construction impacts on biodiversity**

AW conclude these impacts will be short term and often offset by the longer term habitat creation. All construction impacts would be dealt with through the CEMP and Clause 5.3.1 provides for the use of an Ecological Clerk of Works (ECoW).

Residents’ confidence in AW’s systems is currently low due to, for example, the lack of consideration of nesting skylarks.

FDPC recommends the following in relation to design and further studies of operations:

- The layout of the Works aiming to improve recreation should be reassessed and be made subordinate to the aim of preserving the ecological system around Low Fen Drove and the CWS since this system already supports an unusual assemblage of species, particularly *Hymenoptera*. Particular damage is likely from the combined use of the former railway NE of Low Fen Drove as a Bridleway (Work No 32) and the link path (within the scope of Work No 2?) running east of the AW proposed works to Low Fen Drove. The latter element will cause extra severance of the CWS and should be omitted. At least one alternative layout, proposed elsewhere, exists with a more northerly access from Low Fen Drove towards Allicky Fm, (Station Rd Quay) using the branch of the concrete strip road which runs east from Snout Corner, beyond the steel barrier, to Black Ditch. Here there would be a footbridge and after that, following the edge of two fields, the path would link to the lovely drove road which meets Station Rd at the triangular plantation. Such a layout would retain two, not three, entrances to the paths AW propose immediately outside the bund and thus still maintain a circular walk whilst avoiding all use of the former railway line. In addition, this alternative would provide better linkage towards the Wicken Fen Vision’s spine access paths although a longer route to Anglesey Abbey.
- Where public use is granted, would animal proof fences be needed to prevent dogs roaming? If so, how would wild animals still be able to cross the alignment?
- Invertebrate species listed in Appendix 2 should not be given less consideration than those in Appendix 1.

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- The full ES investigations of Biodiversity Net Gain, Light Impacts and other supporting studies should be completed and provided for review. This would overcome the many aspirational, generalities in the current consultation.
- The Habitats Assessment should examine the impact of invasive species being introduced from the Bannold Ditch catchment to the River Cam above Bottisham Lock when untreated storm water effluent is pumped upstream for discharge at the existing and proposed future outfalls next to the A14. This mechanism for an effect does not appear to be included in the PEIR. and;
- The BNG calculations should not claim excessive scores from ‘improvements’ to the CWS. The whole question of whether the CWS should be left under the ownership and management of the current owners should be reconsidered. This may be preferable to a high land take in order to assist AW’s aspiration to achieve 20% BNG.

FDPC recommends the following three points which have been noted in relation to construction and must be included in the CEMP:

- Treated Sewage Effluent used for pipeline pressure testing must not be discharged into drains connected to the Black Ditch. This should be possible since there will be twin pipelines connected to a WWTW at both ends;
- The Veteran and other notable trees and the CWS must be fenced off to protect root zones and canopies from passing equipment; and;
- A feedback mechanism to the Community is needed and independent specialist oversight provided as part of this.

### 12) Carbon

The aspiration for Anglian Water business to become operationally net zero by 2030 is laudable but we challenge the possibility of the CWWTPR project reaching the target of 70% against AW 2010 baseline given the carbon expenditure involved in decommissioning and decontamination of the current site.

There is little evidence to support the statements in PEI Carbon as AW has stated it will defer sharing the data on the cumulative environmental effects of the relocation project, the re-development of the existing site and other relevant projects until inclusion in the Environmental Statement at the DCO application. These relevant projects have not been described. There is little extra information since the very brief references in Consultation 2. Information of concern which must be provided includes:

- Data of the 2010 baseline on which the evaluation of carbon neutrality will be based. We understand from the discussion on 19<sup>th</sup> April that this relates to a generic design for works of a comparable size.

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- Data to support the claim that biogas generation will result in the calculated reduction of 4680 tons of carbon dioxide equivalent per year against the 2010 baseline solution. Figures for gas production and power consumption of the existing WWTP have not been given but should also be included.
- Details of the integration of solar power generation for low carbon electricity; the stated 7 MWh per year is ludicrous since it is insufficient to run an electric kettle continuously. It is not clear if this figure was intended to refer to peak or likely maximum average in a year or how the power demand is calculated for the proposed plant. Correct values and a comparison with the existing works should be provided.
- Photovoltaic panels - the location of the PV arrays, to make up the deficit, need to be explained; it is not clear if they will be visible above the earthwork bund.
- Energy demand -it is not clear if Waterbeach effluent pumping has been included in the energy demand calculations.

FDPC notes, in addition to providing the missing information, that:

- a) We agree with the use of solar panels but AW must commit that these will remain within the bund and if visible should be included in data on structure heights and included in visualisations;
- b) More detail must be given on how these carbon proposals will be monitored and reported; and;
- c) Limit use of flexibility to be requested under DCO; changes at that late stage would impact our review of the Environmental Statement.
- d) The entire proposed CWWTPR is the antithesis of the principle set out in HM Treasury “Infrastructure Carbon Review”, 2013. This stresses that minimisation by design should include both avoidance and maximising use of existing assets. Not relocating the works at all would be closer to this principle even if more odour control work needed to be carried out at the existing works to reduce its impact on surrounding land and properties. A more direct route for the Waterbeach transfer would reduce the embedded carbon compared to the current proposals, as would omitting Shaft 4 on the transfer tunnel. In contrast, we accept that the extra mitigation we consider necessary may increase the cost or carbon footprint of the proposed scheme. However, this should not be used as a reason for reducing the mitigation to be provided,

### 13) Climate resilience

The significant effects from climate change in Table 1 of the PEIR topic paper summary focuses on protecting the assets and workers from the likely effects of climate change rather than wider environmental impacts which are not covered in such detail. Mitigation given measures in Table 2 are highly aspirational with, in general, little evidence given of how it will be achieved or a basis on which they can be fact checked.

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As described in Section 1 above, the stormwater management proposals focus on the design condition; there is no in-built resilience to out of design conditions. Information of concern which must be provided includes:

- Data for the design inlet and outlet storm water flow at the works under the current and 1:100 +20% condition in 2040 and 2050 together with predicted changes to the frequency of CSO events.
- The upper design air temperature range of 40° C needs to be clarified as to if this is a daily average or peak value.
- Clarity as to whether the water to be supplied to the transfer tunnel, in order to alleviate low flows, will be sourced from drinking water or elsewhere.

FDPC supports the use of drought resistant planting and the use of SUDS systems for drainage of the access road. However, in addition to providing the missing information, AW should:

- a. Provide details of how it will meet the commitment that the surface water drainage network within the proposed WWTP will be internal to the bund to avoid overland escapes to land, the Black Ditch and Quy Fen.
- b. Providing an emergency overflow outlet from the Waterbeach system.
- c. The River Cam flood model should include examination of land in the defended floodplain at Waterbeach.
- d. The assumptions about future stormwater flows, capacity requirements and water use by residents should include a variant based on Business As Usual water use by customers and be clear about population projections after 2040. There is no reason at this stage to stop at 2040 since projections exist within the Water Resources East publications to 2050 and alternative growth beyond could be based on, say, 0.5 0.75 and 1% growth alternatives.
- e. Commit to maintaining construction of future expansion of the treatment works within the existing bund as described in Section 1 above.
- f. Ensure that the improved natural airflow through the bund required to alleviate high temperatures will not lead to odour problems for residents or degrade the effectiveness of landscaping.

### 14) Water

The water topic covers flows, quality and flooding (under normal conditions with links to storm flow conditions) in surface water and groundwater. The PEIR notes that these matters are subject to permits issued by the Environment Agency. We include references to AW's statements about '...there being no operational reason to move' because the consultation documents can give the opposite impression.

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## 14.1 Flows

The PEIR does not provide baseline or future permitted flows from the sewage treatment works. Following the Cambridge Independent's article in January 2021 about AW's discharges into the River Cam exceeding their legally permitted flows, FDPC subsequently obtained some background information from the Environment Agency, DEFRA and OFWAT. Responses suggest that the existing works at Cowley Road had a permitted discharge of 36,000m<sup>3</sup>/day which was set before 2004, raised to 37,330m<sup>3</sup>/day in 2010 and was current until at least 2021 and is possibly still current.

Between 2015 and 2020, actual dry weather flows (DWF) were between 40,091m<sup>3</sup>/day and 43,463m<sup>3</sup>/d. AW then began investigating the likely permitted quality limits for a proposed increase to 44,851m<sup>3</sup>/day; intended to bridge the gap until the proposed CWWTPR would be operational. FDPC have requested the Environment Agency to provide an update on the status of and any reports relating to this proposed increase. This may include material or recommendations from Anglian Water's consultations with Natural England.

In discussion of 19th April 2022, AW advised that treatment capacity is not just a function of population served; per capita water supply being one of the other factors. In their OFWAT submission of 30 Aug 2019, which covers the current price review period, AW states that Cambridge STW served a population equivalent of 161,905 (based on 2017-18 data). 2016 data reported elsewhere shows the existing works was treating waste water for a population equivalent of 143,927 against a capacity of 200,000.

It appears therefore that AW's proposed increase in permitted DWF to a value of 44,851m<sup>3</sup>/day must be intended to accommodate the growth in Cambridge's population from 2017 to 2028 plus the addition of flows from the existing Waterbeach Plant (capacity 6490 PE) and the additional growth in population to be served in the new and old areas of Waterbeach. This conclusion that the enlargement in future may be both necessary and brought forward by the addition of Waterbeach does not lend any support to whether there is an operational need to move, AW having previously asserted there was scope to provide additional capacity at the existing site.

The PEIR notes that the 95 percentile flow in the River Cam at Bottisham lock is 0.9m<sup>3</sup>/s. This is equivalent to 77,760m<sup>3</sup>/d. Although this flow and the DWF (calculated as the 90 percentile observed discharge) are not necessarily concurrent, it is clear that treated effluent discharge is a significant fraction of low flows in the river and therefore adds significantly to water resources downstream in critical periods. The PEIR notes that high river flows are over 100 times greater than low flows; it follows that treated effluent is a small percentage of these high flows and their corresponding water levels.

The PEIR notes that flows in the Waterbeach IDB drains would reduce as a result of the transfer of the effluent to the proposed works.

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These conclusions do not relate to water quality aspects in which are discussed in the next section.

FDPC considers that:

- a. AW should provide a clear statement of their predictions covering the period from 2015 to 2050 of: populations to be served; flow to full treatment; Dry Weather Flow and treatment capacity.
- b. AW should provide their assumed future values of Q95 flows at Bottisham Lock.

### 14.2 Water Quality

AW state in the PEIR Introductory Paper that "...The Environment Agency has proposed, as a result of the permit pre application process, the following indicative limits for the proposed Cambridge WWTP". FDPC have compared the existing and proposed, improved water quality limits as shown below. We include a column factored by 275,000/200,000 (the nominal population served) to give a sense of the difference in total loading on the downstream river system were the discharges to operate at water quality limits in proportion to the number of persons served.

Water Quality Element (mg/l)	Existing	Proposed	Factored Existing
Phosphorus	1	0.4	0.55
Total Suspended Solids	20	14	19.25
Biochemical Oxygen Demand	15	11	15.13
Ammonia	5	3	4.13

Our analysis suggests that the quantum of three determinands as a downstream load will change by less than +1 to -18% with the new limits in place apart from phosphorus where a reduction of 45% will be required. This may relate to the statement that the River Cam and the Lode are already classed as "Poor" due to phosphorus concentrations. This conclusion that improved discharge standards are required in future does not lend any support to whether there is an operational need to move.

Elsewhere, AW state in the PEIR material on biodiversity that the impact of the proposed discharges will be subject to a Habitats Regulations Assessment which will examine the impact on downstream sites including The Wash. However, this assessment would not cover the Black Ditch and Quy Fen SSSI due to the lower conservation classification of the latter. The PEIR addresses the concern that the overall design of the system must prevent effluent or untreated overflows entering the Black Ditch by stating "Any surface water which has potential to be contaminated will be contained within an enclosed drainage system and passed back for treatment through the proposed WWTP." However, the pathways to the Black Ditch must be included.

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The PEIR suggests that the desk studies reveal there are ten unlicensed private abstractions from boreholes and wells in the area but no major or licensed abstractions. AW predict there will not be significant changes to groundwater quality.

FDPC considers that:

- a. AW should provide a copy of the draft Habitats Regulations Assessment.
- b. AW should include an assessment of what changes in effluent quality may be required as a result of climate change and what assumptions they have made to ensure the future expansion to 300,000PE can be accommodated inside the bund.
- c. AW should ensure that buried piped land drains are recognised as potential flow and pollution pathways to the Black Ditch.
- d. AW should ensure effluent used for pipeline or pressure testing is not discharged to drains connected to the Black Ditch.
- e. AW should provide their surface drainage strategy.
- f. AW should revise their Hydrogeological Impact Assessment Report to include the Waterbeach pipeline and ensure that the desk study of groundwater users is expanded to include everyone who has or will contact AW about their borehole or well.

### 14.3 Flooding and Stormwater

AW describe how the proposed works are sited in land not likely to flood. However, this does not lend any support to whether there is an operational need to move, since the PEIR also shows this to be true of the existing site.

Our discussion and recommendations on the risk of sewage flooding in and around the proposed site and the additional mitigation required are dealt with elsewhere in this response.

### 15) Historic Environment

The PEIR describes the preliminary assessment of the construction and operation of the proposed WWTP on the historic environment assessment, including emerging information from archaeological investigation, and identifies the potential impacts. It sets out how AW intend to develop proposals to avoid and reduce impacts to the historic environment. Potential impacts include consideration of visual impacts, traffic, noise/vibration and odour in addition to physical damage.

Appendix 2 contains a review of AW's material and has been prepared by a resident before inclusion in the consultation response submitted by the Save Honey Hill community group. The review also identifies additional baseline conservation interests and potential impacts. Overall impacts and associated mitigation requirements may reduce once AW have acted on design and mitigation under other topics as we note elsewhere in our response.

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FDPC fully supports the recommendations contained in the Appendix and considers that these should be treated as either demonstrating the need for further information or additional mitigation.

### **15) Land contamination**

The PEIR describes the preliminary risk assessment due to land contamination and also examines pathway and receptors.

AW conclude that “New contamination sources and/ or pathways will not be introduced as the proposed development will include mitigation measures as set out in the CoCP. Following mitigation there are unlikely to be significant land contamination effects.

FDPC draw attention again to the possibility that there is an historic landfill on the northern side of Field/Filly Lane towards its western end. Anecdotal information in Cambridge Archives refers to night soil being emptied in this area around the start of the 20<sup>th</sup> Century. This could be within the red line boundary and under or close to the proposed route of the Waterbeach transfer pipelines.

Our assessment of waterborne pollution pathways and the requirement for mitigation by design is described in other sections of this response.

### **16) Recreation**

The PEIR includes preliminary information on recreational activities and potential changes on use and access to open space and recreational areas during construction and operation of the proposed works. It appears that AW recognize the limitations of what appears to be mainly a desk study but nevertheless conclude that disruption of non-vehicle routes during construction will require close attention and careful management. In contrast, the proposed works are described as being intended to provide benefits from a new network of access paths in the landscaped area around the bund and from providing new connections to and within the wider area.

In our response of 9 September 2020 we objected to the proposed use of Honey Hill for a relocated works and noted that the public use of the Low Fen Drove Way as a ProW encompasses a wide range of activities beyond mere access from one end to the other. These include walking, running/jogging, cycling and riding. People undertake these activities as recreation and to promote their health and wellbeing. This type of public use was especially noticeable during the good weather and COVID 19 lock down period. The whole area is used by visitors from other places as well as residents of Fen Ditton, Horningsea and Cambridge City Abbey Ward. The latter is recognised as one of the most deprived areas of Cambridge and the continuing access to an area of tranquil, pristine, green space is vital for well-being. Developments incorporated in the emerging Local Plan will increase the need for such an area. This area’s importance will increase as Honey Hill is at the southern gateway of the green corridor connecting Cambridge to the Wicken Fen Vision area.

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FDPC draw attention to the many recent changes to the routes used for recreation and the fact that there are also imminent changes due for construction or additional design. Figures 1 to 4 in the PEIR should be updated to show the future baseline. We would be happy to assist with identifying gaps in the mapping of the baseline network as we understand it will be in future.

Our responses elsewhere in this document cover missing information and required mitigation for other topics which, by reducing impacts outside the bund, would improve the potential for recreation in the longer term. In contrast, the disruption to recreational use during construction will be a direct consequence of measures to ensure everyone's safety.

We draw attention to points we have made elsewhere in this response since they are relevant to recreational use. These include:

- An alternative location of the Waterbeach pipeline river crossing to a point north of the A14 would reduce construction traffic running along Horningsea Road and its cycleway through J34 and south of the A14;
- A complete realignment with a shorter, more direct route from Waterbeach to the existing works would remove a substantial amount of construction activity from areas of recreational use;
- Omitting Shaft 4 would remove construction activity from the area of a well-used footpath;
- Banning some turning movements at J34 are necessary to avoid vehicles short cutting along Low Fen Drove;
- Option 3 access would reduce vehicle use on Horningsea Road.
- Construction traffic must be banned from Low Fen Drove east of the Waterbeach pipeline unless engaged in changes to the recreational path network
- The proposed new path running east from the landscaped area outside the bund should be omitted; and;
- The former railway line should not be included in the red line boundary but an alternative alignment further to the north west should be substituted.

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## APPENDIX 1 Landscape and Visual Amenity (Offsite)

The following material has been prepared by a resident and included in the consultation response submitted by the Save Honey Hill community group. Cross references and footnotes should be followed up from their original text.

**“2.2.2 The PEI Landscape and Visual Amenity (PEILVA<sup>62</sup>)** report reviews the Landscape Character, Strategic Green Infrastructure and Green Belt and considers the impact on the nearby villages. This forms the basis for the PEI assessment of the impact of the Proposed Development on Landscape Character and Visual Amenity and in turn mitigation measures proposed<sup>1</sup>.

### 2.2.2 i Green Belt

The significance and impact on the purpose of Green Belt is considered to be under- represented and reported.

The Overview of local landscape character and views provided describes the Proposed Development as ‘situated partly in the Green Belt...’<sup>2</sup>. This is an under representation of the significance of Green Belt with this proposal. Later in the document it is acknowledged that all of the Development with the exception of short section of the Waterbeach pipeline would be in the Green Belt<sup>3</sup>

The review of the GCP Green Belt Study 2021 presented identifies ratings attributed to the purpose of Green Belt in the parcel of land identified for the Proposed Development (OA2). The PEILVA report references a low contribution to 1 purpose of Green Belt and a moderate contribution to 2 purposes. However, it does not report that development as an extension of the villages or within the parcel of land OA2 is assessed as causing ‘Very High Harm’ to the purposes of the Green Belt.<sup>4</sup> The latter is clearly of significance to the assessment of impact the Proposed Development would have on the effects of change in landscape character and visual amenity in the area identified for the Proposed relocation/development.

Since the early establishment of the Cambridge Green Belt the villages within it, often referred to as necklace villages, have been recognised as significant in their contribution to the special character and setting of the historic City of Cambridge and as being an integral component of the Green Belt protecting it<sup>5</sup>. In addition to the physical and visual separation of the villages, their rural setting, scale, character, and identity are established as key characteristics and qualities of the Green Belt to be protected<sup>6</sup>. Protection of the Villages surrounding Cambridge and the historical assets within them is also specified in Local Plan Policy.<sup>6</sup>

Fen Ditton is one of three innermost villages identified as of particular importance in the setting of Cambridge and in need of protection due to its close proximity to the City, the foot paths and

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<sup>1</sup> CWWTPR PEI Landscape and Visual

<sup>2</sup> CWWTPR PEI Landscape and Visual

<sup>3</sup> CWWTPR PEI Landscape and Visual

<sup>4</sup> GCP Green Belt Study 2021

<sup>5</sup> Greater Cambridge Green Belt Assessment 2021; Cambridge Green Belt Study 2002; Cambridge Inner Green Belt Boundary Study 2015

<sup>6</sup> SCDC Local Plan 2018

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national trails leading out of the City to it and its rural setting<sup>7</sup>. The Greater Cambridge Green Belt Study (2021)<sup>8</sup> identified Development within Fen Ditton, Horningsea and Outer Area (OA2) that serves to separate the two villages of Fen Ditton and Horningsea, would cause 'Very High Harm' to the Green Belt<sup>9</sup>. It is within this area the relocation of the CWWTP is proposed. See illustration Fig 4.44 p116 of the GCP Green Belt Study 2021<sup>10</sup>.

Figure 4 p15 of the PEILVA illustrates the impact the size and scale of the Proposed Development would have on Fen Ditton and its Conservation Area, leaving the Village nearly isolated from the Green Belt and impacted by urban development.

## Recommendations

**1 Greater and broader cumulative consideration is made of the impact the Proposed Development would have on the Green Belt within the parcel of land identified for development and the Villages and Conservation Areas adjacent to it. All of which contribute to the setting and character of Cambridge City and are protected by Local and National Planning Policy.**

**2 The 'Very High Harm' the Proposed Development would have on the Green Belt as identified in the GCP 2021 Green Belt Study is reported.**

### 2.2.2.ii Impact on Villages

We consider the impact of a change in views from the villages of Fen Ditton and Horningsea have been underestimated. Both are set within their own Conservation Area. There will be extensive views of the plant above the earth work bank in the long term from within the village boundaries; on approach to the villages and from an extensive local PROW network used by local residents and visitors to the area. The views of the Proposed Development will have a significant negative impact on the setting and character of the Conservation Areas, Listed properties within them and the quality of PROW amenity value.

The Conservation Areas of Fen Ditton, Horningsea and Baits Bite Lock have not been considered in the sensitivity assessment in the context of effect on change of landscape or view. This is considered an omission. Fig 4 p15 of the PEILVA illustrates the proximity of the Conservation Areas and the size, scale and dominance of the Proposed Plant Area in relation to them<sup>11</sup>.

## Recommendations

**The impact on the setting and character of the Conservation Areas of Fen Ditton, Horningsea and Baits Bite Lock should be included in the assessment of the impact of change in landscape and view in the context of the Villages and the Baits Bite lock area. Approaches to the Villages via road and PROW network should be included.**

### 2.2.3 Visitors' Car Park

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<sup>7</sup> Cambridge Green Belt Study 2002; Cambridge Inner Green Belt Boundary Study 2015

<sup>8</sup> Greater Cambridge Green Belt Assessment 20221

<sup>9</sup> Greater Cambridge Green Belt Study Appendix B

<sup>10</sup> GCP Green Belt Study 2021

<sup>11</sup> CWWTPR PEI Landscape and Visual

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The Proposed Development has sited the Visitor Car Park outside the reception area and is not understood to be secure. This is identified in the PEILVA as remaining visible from Horningsea Road A14 bridge. A Car Park to accommodate 100 vehicles including HGVs appears excessive and likely to be used for 'permanent' parking of HGV Tankers and overnight HGVs on route to Felixstowe etc.

The visual impact including any lighting associated with the car park would also detract from the environment created by the landscape proposals, both in the earth work bank, surrounding area and of the reception area. The effect being to extend the footprint of the industrial-urban development beyond the 22ha identified as required for the relocation encroaching further than necessary into the Green Belt and being visible.

**It is recommended this be reconsidered in the context of security and potential misuse e.g. of the public access paths within the landscaped site area, overnight lorries, fly tipping etc.**

**It is recommended the visitor car park is out of view and contained within the secure area inside the earthwork bank framework.**

### 2.3 Representative Viewpoints

The PEI Landscape & Visual Amenity report has identified a range of representative visual receptors for assessment, these are numbered and presented in a table. They have been grouped (A to E) according to the position of the views of the proposed development and effects on views that are 'likely to be similar'. A photographic illustration for each group has then been presented as a typical illustration pg. 19-22. Appendix A contains a different range of illustrations with computer generated impressions of the view of the Proposed Development at years 1 and 15; a Map showing the position of the viewpoint captured in the photomontage is provided in the main text p46. A summary table of the assessment outcomes for each Group is presented.

Two important sensitive viewpoints within 1km of the Proposed Development have been omitted and are detailed below; Fen Ditton Recreation Ground and Footpath No. 85/3 looking North East.

A number of viewpoints, particularly in Group D, have wide distant open views of the Proposed Development with sections of hedgerow or tree cover that would provide some screening of the view. A number of the photographic illustrations provided to be representative of the area are noted to capture tree cover rather than the wide-open views. These include:

Photo 11 Viewpoint 31, the view from Bridleway Stow cum Quy 218/5

Photo 12 Viewpoint 4 - the view from Footpath Stow cum Quy 218/2 (between Quy Mill and Stow cum Quy)

Photomontage View south from Horningsea Footpath 130/6.

It is believed the omissions and approach to capturing the viewpoints from sensitive visual receptors identified above may have contributed to what is considered to be an underestimation in the assessment of the significance of effect on sensitive visual receptors, particularly in Group C and D, in turn limiting the mitigation measures currently proposed.

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## Recommendations

The recommendations presented in 2.3 and 2.4 below including examples of alternative viewpoints with photographic illustrations and mitigation measures. These recommendations should be developed in close liaison with local representatives. This should be the cheap greater use of local knowledge.

### 2.3.1 Group A

The photomontage illustrations in the Appendix of the PEILVA provided demonstrate that within the immediate vicinity of Biggin Abbey the views of the Proposed Development would be screened by the proposed planting and mitigation proposals within the site area. However, it is anticipated a more distanced view from the sensitive visual receptors at riverside footpaths to the south and west of Biggin Abbey would reveal the taller structures of the Proposed Development and that further off-site mitigation in the riverside area may be desirable.

## Recommendations

**It is recommended that a more distanced photomontage of the view of the Proposed Development to the South West of Biggin Abbey from the riverside footpaths is presented. This would correspond with the Tabled Viewpoint No. 23 from the footpath 162/1 looking East or an additional viewpoint created from the footpath on the same side of the river as Biggin Abbey looking East from footpath No. 85/6, where single tree planting in keeping with the River Cam corridor may be beneficial along the field edge to soften/break views of the taller structures if they are shown to be visible.**

See **Appendix Photo 1** Recommended Photomontage from Footpath **162/1 looking East**

### 2.3.2 Group B

The effect on views and character of landscape in this Group B are identified as ‘potentially remaining significant’ at year 15. ‘The proposed WWTP would remain a noticeable feature...’ However, these effects are only noted for a small number of receptors (assumed to be residences) and no off-site mitigation measures have been proposed.

There are a number of Tabled viewpoints along High Ditch Rd. Fen Ditton. Viewpoint No. 12, close to residences within the Village boundary west of the disused railway, is illustrated in a photomontage in the Appendix of the PEILVA, the taller structures clearly remaining visible at year 15. Photo 8 in the main text is of a more distanced viewpoint no.7 looking north further east on High Ditch Rd close to the junction with Newmarket Rd. This view extends for some distance along High Ditch Road towards the disused railway line until hedging and scrub in the vicinity of the railway bridge come into view. Here there are gaps in hedging where the Proposed Development with a similar viewpoint would be revealed. There are a number of residencies that currently enjoy open views from back gardens and ground and first floor windows across the fields towards the Proposed Development.

It is believed there has been an underestimation of the sensitivity of landscape character and visual amenity to change along the length of High Ditch Road, an important rural approach into the village forming an essential aspect of the character and setting of the Fen Ditton Conservation Area and historical assets including remnants of Fleam Dyke and multiple graded

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properties. High Ditch Rd is also of high recreational usage, particularly cyclists who work their way from Cambridge along cycleways through Fen Ditton along High Ditch Road (rather than via the P&R) to pick up the National Cycle route 51.

Photo 8 in the PEILVA illustrates a view of the Proposed Development looking north east from Horningsea Rd Fen Ditton just inside the field entrance. Some residences on Horningsea Rd or Musgrave Way may have views from their gardens, ground floor and first floor windows.

An additional or alternative viewpoint is recommended opposite the Village sign on Horningsea Rd on approach to the village. Visual receptors include recreational users of the cycle and footway. The photo provided below shows significant views of the Proposed Development that could easily be softened by extending the hedgerow planting from the A14 bridge towards the village sign.

See **Appendix Photo 2**. View from exit of Footpath 85/5-130/3 looking North East  
Recommended Hedgerow/Tree Planting

### Recommendations

**1 Off site mitigation such as gap filling in existing hedgerows and a single row of new field/verge edge tree planting similar to the proposed off-site planting for Horningsea Rd, Horningsea, for the length of High Ditch Road where there will be long stretches of views of the taller structures. The objective would be to soften and break up the views with suitably 'open' spaced native trees, not to attempt a wall or complete screen. Note tree planting may need to be field edge for sustainability, it is believed at least in part the verge contains a drainage ditch on the north side. There is a history of field edge native trees along High Ditch Rd. though few if any remain.**

**2 Residences on High Ditch Road east of the railway bridge and Newmarket Road, as identified in Area B and west of the railway bridge within the village boundary on the north side of High Ditch Road should be contacted with a view to being offered hedgerow and or tree planting within their property boundaries or adjacent field edge if this could be negotiated with the landowner.**

**3 Residences on Horningsea Rd, Fen Ditton, who will have views of the Proposed Development, should be contacted with a view to being offered hedgerow and or tree planting within their property boundaries or adjacent field edge if this could be negotiated with the landowner.**

**4 Residences on Horningsea Rd Fen Ditton and Musgrave Way facing North are contacted with a view to being offered hedgerow and or tree planting within their property boundaries or the adjacent field edge if this could be negotiated with the landowner.**

**5 Off site mitigation should be provided to extend the existing hedgerow on Horningsea Rd, Fen Ditton extending from the A14 bridge towards the Fen Ditton Village sign.**

**The above would have the advantage of biodiversity gain extending beyond the site area.**

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## 2.3.3 Group C

It is believed two important representative viewpoints have been omitted from within the Fen Ditton Conservation Area and would be included within Group C for proximity or B for matched significance of effect: Fen Ditton Recreation Ground and footpath No. 85/3, which runs along the field edge at the back of residences of Green End looking north east. Both viewpoints are recreational and from 'time-spent' it is believed they would be categorised as having a 'high sensitivity to change'. They both have a wide-open view towards the Proposed Development, the pylons are clearly visible to the extent it is believed the taller structures would be in view in the longer term and effect of change in landscape character and visual amenity would be assessed as 'highly/significant impact' from construction through to 15 years.

If grouped in 'C' it is believed this would impact on the rating attributed to visual impact at 15 years and would justify consideration of off-site mitigation. Photographs of representative views of these two receptors have been included in Appendix 1.

**See Appendix Photo 3** View from Fen Ditton Conservation Area-Fen Ditton Recreation Ground

**See Appendix Photo 4** View from Fen Ditton, footpath 85/3 -85/4 junction - photomontage recommended

### Recommendations

**1 An illustrative photomontage should be taken at the junction between footpaths 85/3 and 85/4 and from Fen Ditton Recreation Ground**

**2 These Viewpoints should be added to the Tabled list**

**3 Off-site mitigation measures should be considered by Anglian Water and proposed.**

2. The impact of the discharge outflow and vent shaft within the River Cam LCA is assessed in the PEILVA as being 'unlikely to be significant' in the first year of operation or beyond; the new discharge outflow is stated as not dissimilar to existing on the north side of the river. Given the scale of engineering proposed, proximity to residences including a Grade II property, Conservation Area, and PROW's it is believed this is an underestimation of impact on landscape character and visual amenity. (See Appendix 1 photo 5 below of existing discharge outflow structure).

The Ventilation shaft No 4 is proposed to be on elevated ground above the footpath and will have the appearance of being much higher than 8m. There is also the potential for cumulative impact with open views of the new Development across from footpaths on both sides of the river and a large new, presumably concrete structure (11m x 4m x 3m), constructed in an otherwise naturally formed river bank, frequently used by nesting water birds. It is understood current plans are to cut the engineered structure some metres back into the river bank rather than it being sited in line with the existing river bank edge. This will have a significant impact on a well-used and highly pressured footpath in a relatively narrow section of land.

Currently, once away from under the A14 bridge, the pedestrian and waterway user is free of views of concrete engineering, the river banks consisting of natural habitat. Contrary to impressions in the PEILVA the existence of the A14 underpass does not mean other engineering

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at scale within the vicinity of an otherwise rural setting with rich habitat for water birds well used for nesting would have no impact on landscape character and visual amenity; the existence of the A14 underpass is a reason to afford more, not less, protection in this conservation area against further negative impact change not less.

See **Appendix Photo 5** Visual Impact and Placement of Existing Discharge Outflow

### **Recommendations**

**A photomontage should be undertaken of the ventilation shafts within the settings of both properties and footpath (from the lower ground) illustrating the visual impact from construction to years 1 and 15. The shaft should be omitted or relocated to less sensitive settings.**

**A photomontage of the proposed discharge outfall area should be undertaken from construction to years 1 and 15**

**The impact of these engineering structures should be re-assessed and mitigation measures proposed, including reference to impact on existing riverside habitat and requirement of 20% net gain in biodiversity.**

**The intention to ‘cut-in’ to the riverbank to accommodate the discharge outflow should be reviewed in the light of the impact on the wear and tear of any narrowing of the existing footpath and loss of visual amenity value of the natural riverbank and associated vegetation and habitat.**

**Anglian Water should work directly with Cam Conservators to inform assessment of the impact of construction works, long term changes to the river banks in the area and mitigation measures.**

### **2.3.4 Group D**

This group is identified as having ‘distant views mainly obscured by hedgerows and trees’ and that in the longer term there would be ‘glimpsed views’ only through gaps in existing hedgerows and tree lines. This is believed to be an underestimation of the effects on these important visual receptors.

Within this Group there would be significant stretches of uninterrupted and open views of the landscape amongst an important extensive network of PRoWs with views from the North East round to the South East of the Proposed Development. The receptors themselves are identified in the PEILVA as having ‘high sensitivity’ to change. There are three photographic images provided none of which are considered representative, each view obscured by tree line.

Photo 12 in the PEILVA of Representative viewpoint 4 - the view from Footpath Stow cum Quay 218/2 Harcamlow Way near Quay Mill sited to the South East of the Proposed Development identifies the latter as being behind a tree belt-small woodland. It is thought however this view is incorrect and has been taken looking NNW from the footpath. An alternative photograph is presented below in the Appendix looking northwest, the line of Pylons and the point where they merge to the north east of the Proposed Development can be seen in the distance, it is believed

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therefore that there will be open views of the taller structures of the plant from this visual receptor including Quy Mill.

**See Appendix 1 Photo 6** Alternative Viewpoint Footpath Stow cum Quy 218/2 Harcamlow Way near Quy Mill looking North West

A photomontage is presented in the Appendix representing views from Footpath 130/6 looking south. This shows the majority of the Proposed Development obscured by an existing narrow tree belt, believed to be The Biggin Plantation and identifiable on the Map showing the position from which it was taken. There are however other extensive open views along this footpath from which it is believed distant views of the Proposed Development would be seen. The photograph no. 7 in the Appendix illustrates an alternative representative viewpoint taken from the same footpath. This viewpoint is also of significance to the local business, Gayton Farm Campsite which is believed to have uninterrupted views across this landscape; change in landscape and amenity view would be highly significant.

**See Appendix 1 photo no. 7** Alternative representative viewpoint taken from Footpath 130/6 looking south.

Photo 11 in the PEILVA of Representative viewpoint 31 - the view from Bridleway Stow cum Quy 218/5 has been taken close to Allicky Farm. The viewpoint is to the northeast of the Proposed Development and illustrates it as being screened behind a tree belt. There are however open views to the south of the disused railway line from this Bridleway in the vicinity of Quy Hall. The photograph no. 8 in the Appendix is an alternative representative from 218/5 looking southeast, the pylons can be seen in the distance and there is potential for the taller plant to be visible.

**See Appendix 1 Photo no. 8** Alternative representative viewpoint from 218/5 looking southeast.

The viewpoint No 15 from Anglesey Abbey is described as being ‘sheltered by woodland planting’. However, there is a view-point popular with visitors within the grounds that extends out over the Fen landscape directly towards the Proposed Site Area. This may be of sufficient distance from the Proposed Plant that it would not be seen. However, it is believed this should be referenced and assessed rather than dismissed. This is also true of viewpoint 16 Bridleway Stow cum Quy 218/5 and Footpath 218/4 (Quy Waters viewpoint not tabled). Looking west, there are wide open views from which the Proposed Development may be visible and appropriate mitigation measures provided.

### **Recommendations**

- 1 The selected viewpoints forming the photographic illustrations and photomontage for Group D of visual receptors is reviewed in the light of the above.**
- 2 Where there are both restricted views as a result of existing tree line and hedgerows and open views within an identified viewpoint area photographic illustration should ensure representation of the open views.**
- 3 The assessment undertaken of the sensitivity to change of landscape character and view and effect of change should be reviewed for Group D and where appropriate mitigation measures added.**

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## 2.3.5 Group E

This Group describes views of the Waterbeach pipeline route. Photo 13 of the PEILVA representative viewpoint 35 shows the Waterbeach pipeline crossing fields opposite the Cam Boat Club. This is an area of open arable land.

### Recommendations

**1 Further photographic illustrations should be included to ensure representation of the views from residential property on both the east and west sides of Clayhithe Road just north of the bridge over the River Cam and from properties around Northgate Farm.**

**2 At the northernmost point of Clayhithe, The Bridge Hotel, with its riverside frontage, on the west side of the river and Conservator's House on the east will also be affected and illustrations need to be provided from their viewpoint and mitigation considered.**

## 2.4 Landscape Master Plan

The landscape masterplan presented in the PEILVA is to provide 'long-term screening of the new structures from the surrounding area'. The majority of screening measures are focused principally within the boundary of the identified site area and mitigate the effect on visual receptors in the immediate vicinity only (Group A). Off-site planting as recommended by the NPS to mitigate impacts from more distant locations has been limited to a single stretch of mixed standard tree planting extending from Horningsea Village along Horningsea Rd towards the Proposed Development. The plan does not include mitigation measures for more distant views from visual receptors identified in the PEILVA as having high sensitivity and 'significant visual effect' from the Proposed Development identified in Group B such as residences on High Ditch Road and parts of Horningsea Rd Fen Ditton.

It is believed the assessment detailed in the PEILVA informing the Landscape Master Plan has underestimated in some cases the sensitivity of visual receptors, for example High Ditch Rd and for others the significance of effect. This has in turn limited the extent of mitigation proposed in the Landscape Master Plan that can only be described in the case of off- site mitigation for more distant views as unambitious.

It is understood total screening is neither possible or appropriate, that retaining 'openness' in respect of the existing landscape character is important.

### Recommendation

**1 The extent of off-site planting proposed should be reviewed in relation to the critique of the PEI LVA assessment and recommendations above (section 2.3.1 to 2.3.5).**

**2 A more ambitious approach is taken to mitigation in order to soften longer distant views of the large number of taller elements from all aspects north, south, east and west of the surrounding area in association with stakeholders and local communities. Single rows of tree planting and filling hedgerow gaps are examples.**

**3 Mitigation measures and provision for long term maintenance should be included in the Master Landscape Plan relating to the engineering works associated with the proposed new outfall area affecting the landscape character of the river bank and essential habitat for nesting water birds. This should be undertaken in association with residences of Red House Close, Poplar Hall Farm, Cam Conservators and Townlands Trust (Osier Holt) with a view to achieving a net 20% gain in biodiversity in the immediate area.**

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**4 Mitigation measures in relation to the proposed vent shafts impacting residences and users of footpaths in the Cam Corridor LCA and Fen Ditton Conservation Area should be included in the Master Landscape Plan.**

**5 Planting to protect visual receptors from distant views of the Proposed Development and identified as extending into the longer term should be undertaken in phase 1 of the Landscape Management Plan.**

**6. Reconsider the robustness of LERMP and projected planting success in light of reports of recent semi-mature tree death in the A14 Cambridge to Huntingdon Scheme Update<sup>12</sup>. There is no reference to a watering/irrigation scheme<sup>13</sup> for mature specimen trees.**

**7. Commit to using biodegradable tree guards and ties instead of plastic the production of which is carbon heavy and their breakdown harmful to wildlife.<sup>14</sup>**

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<sup>12</sup> A14 Huntingdon to Cambridge Scheme Update 9 March 2021 2.3.9 and 2.3.10

<sup>13</sup> LERMP 3.3.10 p20

<sup>14</sup> The environmental performance of protecting seedlings with plastic tree shelters for afforestation in temperate oceanic regions; A UK case Study in Science of the Total environment Vol. 791 15 October 20221

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## APPENDIX 1 – Photos

Photo 1 Recommended Photomontage from Footpath 85/6;162/1 looking East



Photo 2. View from exit of Footpath 85/5-130/3 looking North East Recommended Hedgerow/Tree Planting



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Photo 3 View from Fen Ditton Conservation Area-Fen Ditton Recreation Ground looking North East



Photo 4 View from Fen Ditton , footpath 85/3 -85/4 junction - photomontage recommended

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Photo 5 Visual Impact and Placement of Existing Discharge Outflow – runner shows scale, less than 2m in length and unobtrusive. River bank piled, not used by nesting birds, in contrast to south side of river which is primarily provides a natural habitat.

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Photo 6 Alternative Viewpoint - Footpath Stow cum Quy 218/2 Harcamlow Way near Quy Mill looking North West



Photo 7 Alternative representative viewpoint taken from Footpath 130/6 looking south

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Photo 8 Alternative representative viewpoint from 218/5 looking south east



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## APPENDIX 2 -Historic Environment

The following material has been prepared by a resident and included in the consultation response submitted by the Save Honey Hill community group. Cross references and footnotes should be followed up from their original text.

### **“2.11 Historic Environment**

#### **2.11.1 Archaeological Remains**

The Proposed Development has been identified<sup>15</sup> as having the potential to adversely impact archaeological remains both known and unknown across the construction areas. Archaeological investigations to-date, including geophysical survey, have identified archaeological remains of low to moderate value. However, the loss of the irreplaceable resource cannot be mitigated and therefore the PEI HE<sup>91</sup> states the Proposed Development will likely result in a significant effect on archaeological remains.

The work of local historian Peggy Watts (1923-2007) is brought to the attention of Anglian Water. Amongst her publication, The History of Quy Fen (2006), is a map extract dated 1648. This shows a settlement ‘Quir Hal’ as a fen island with a road around it before there was significant drainage of the fens. It is believed this is the origins of Quy Hall, albeit possibly now re-sited. Anglesey Abbey is also present on the map. The scale of the map is not reliable given the proximity of the churches to each other. However, the map is brought to the attention of Anglian Water regarding archaeological investigations in the area of the Proposed Development, particularly in the vicinity of Honey Hill, Quy Hall and Low Fen Drove all of which may relate to this historical feature. Any remains not already recorded being of potential archaeological value and significance.

#### **Recommendations**

**If potential archaeological remains are not already known in relation to ‘Quir Hal’ and the surrounding area, further research is undertaken to inform the potential of finding archaeological remains that may be of significance.**

#### **2.11.2 Historic Landscape**

##### I Historical Landscape Character

It is recommended the relationship of the SSSI Quy Fen, Common Land to the three parishes of Fen Ditton, Horningsea and Stow Cum Quy is noted here and included in the assessment of transient and permanent impact on Historical Assets.

The Parish Boundaries established in 1412 have an unusual interlocking character and culminate together within a fields distance of Quy Fen at which point PROW’s provide direct access to the Fen, now an SSSI site. This unusual configuration of the Parish Boundaries is believed to relate to the shared Common Land between the Villages and access to the Fen. The latter is managed

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<sup>15</sup> CWWTP PEI Historic Environment

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today by Quy Fen Trust, the membership of which includes two representatives from each of the 3 Parishes.

The open Fen Landscape forms extensive views from each of the Parishes towards Quy Fen and an extensive PROW network provides multiple access routes to the Fen from each village; the historical landscape character, views and PROWs on route to the Fen are of significant cultural and landscape heritage for the three medieval villages. There is a rich local history of villagers' use and experience of the Common Land and it remains an important aspect of the villages' assets and recreational amenity. High Ditch Road, an important aspect of the origins and history of Fen Ditton and containing remnants of Fleam Dyke, has been used as part of the access route to Quy Fen and PROWs leading to it. Historical information, including personal accounts of travelling to the Fen from the three villages and its relationship to the three Parishes etc., can be obtained from Quy Fen Trust.

The Proposed Development, its size, scale and extensive industrial features of a large plant visible above the proposed earthwork bank and tree line will have a significant temporary and permanent effect on the setting and character of this cultural heritage which relates to the whole network area of PROW's and landscape character which can be seen to extend from each village and encircle the Proposed Development site for the WwTW. PROWs include National Trails, Fen Rivers Way and Harcamlow Way.

## Recommendations

**1 The PROW network providing access routes to Quy Fen as a whole out of Cambridge and from each of the villages should be assessed within the context of change and effect on cultural heritage, landscape character and public amenity.**

**2 Local residents, with the landowner's permission, have enjoyed access to the disused railway line providing foot and cycle access from Low Fen Drove to Station Road, Quy and on to the PROW network in and around Quy Fen for many years. Opening this route up to formal public and thus wider access as proposed would be welcomed although a note in the tooth new route further to the north-west would have less impact on biodiversity.**

### 2.11.3 Built Heritage

The PEI HE<sup>16</sup> identifies that the Proposed Development has the potential to impact the heritage value assets due to temporary or permanent changes to their setting. The following are identified in the documentation as having permanent impacts to their heritage value: Biggin Abbey, Poplar Hall, Baits Bite Lock Conservation Area, Fen Ditton Conservation Area, Horningsea Conservation Area and a provisional assessment of significance of effect provided.

The PEI Historic Environment<sup>91</sup> identifies that the rural character of the landscape will be altered, in turn altering the character of heritage assets 'where the setting is informed by the surrounding countryside'. The document references the proposed landscape mitigation measures as limiting this impact on change as far as possible.

Notwithstanding the PEI HE<sup>91</sup> is introduced as a summary document focussing on the potentially significant effects of the Proposed Development, with the ES to follow 'providing a proportional assessment of significance for every asset within the study areas'<sup>91</sup>; it is considered there are a

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<sup>16</sup> CWWTPR PEI Historic Environment

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number of omissions that in themselves may benefit from off -site mitigation measures, such as hedgerow and tree planting not so far identified or proposed. These are highlighted below, and recommendations made.

i The absence of reference to Wildfowl Cottage Grade II throughout the document is an anomaly and is believed to justify identification as a specific built heritage asset on which there is likely to be transient and permanent significant effect.

Wildfowl Cottage is identified on the Map of heritage assets and can be seen to be in close proximity to Poplar Hall Grade II and Biggin Abbey II\* within the setting of Baits Bite Lock and within 1km of the Proposed Development. The access route and approach road to Wildfowl Cottage is via the tree lined avenue of Biggin Abbey, there are open views of the Proposed Development looking south-east from the property including first and second floor windows. In having a more distant view of the Proposed Development Site the proposed mitigation measures may not be sufficient to limit the degree of effect which is believed to be significant.

### **Recommendation**

**Wildfowl Cottage should be included amongst the cluster of properties: Biggin Abbey, Poplar Hall, Quy Hall etc identified as within the immediate vicinity of the Proposed Development where there will be both transient and permanent significant effect. Mitigation measures in association with the property owners, such as additional single line tree planting to existing in the vicinity of the property, may be appropriate.**

ii There are a number of graded properties Grade II and of the higher value II\* within the Fen Ditton Conservation Area on High Ditch Road and High Street Fen Ditton within 1km of the Proposed Development which may have views of and taller plant structures from rear gardens, ground and second floor windows and thus setting of the built asset affected.

### **Recommendations**

**Mitigation measures in association with the property owners such as additional single line tree planting to those existing in the vicinity of the property may be appropriate.**

iii There are a number of Grade II properties within the Horningsea Conservation Area on High Street Horningsea that may have views of the Proposed Development and taller plant from first floor windows and or gardens and thus character and setting of the built asset affected.

### **Recommendations**

**Mitigation measures in association with the property owners such as additional single line tree planting to those existing in the vicinity of the property may be appropriate.**

### **iv Fen Ditton Conservation Area**

The PEI HE<sup>91</sup> document references Fen Ditton Conservation Area as likely to undergo permanent impact in relation to character and setting. However, the focus in the documentation is principally in the area of the River Cam LCA and engineering works associated with the transfer tunnel and drainage outlet areas. However, other parts of the Fen Ditton Conservation Area and

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approximately 30 built heritage assets within it and within 1km of the proposed site, are considered to be likely to undergo transient and permanent change and significant effect: the surrounding countryside and landscape informing the setting and character of these historical assets.

High Ditch Road, an important long minor approach road to Fen Ditton Village and Conservation Area is of rural and historical character and of important cultural heritage to the village; a non-designated historical asset. The road contains remnants of Fleam Dyke and has historical associations with the original settlement; Fleam Dyke also having formed the village name, Fen 'Dittone', meaning village by the ditch. It has a key role in the approach to the village forming the character and appearance of Fen Ditton Conservation Area, historical character of the village and the 30+ listed buildings within it.

There will be open views of the extensive tall plant extending above the earth work bank and tree planting from the junction with Newmarket Road up to the railway bridge thus impacting on the rural character and setting. The cumulative impact the Proposed Development would have on the character and setting of the Conservation Area, Fen Ditton Village and the number of Graded Properties affected, including II\* high value properties is believed to be likely to be of high significance and justify mitigation measures. The PEI LVA<sup>62</sup> identified the Proposed Development would be visible in construction and at 15 years but did not include any off-site mitigation measures.

**Recommendations have been made in section 2.3.2 to include mitigation proposals such as single row tree planting along the length of High Ditch Road beyond the disused railway bridge towards Newmarket Rd.**

Fen Ditton Recreation Ground lies within Fen Ditton Conservation Area and would have open views of the Proposed Developed Site and it is thought likely, the taller plant structures. The A14 is obscured from view by hedgerows and does not detract from the view and rural setting. The public use of the Recreation Ground and PROW that runs through it and the change in rural view is considered to be likely to have a transient and permanent significant effect and warrants consideration of suitable off-site mitigation.

**Recommendations have been made in section 2.3.3**

The PEI HE<sup>91</sup> report states that 'The changes to character caused by the temporary presence of construction traffic on Horningsea Conservation Areas will be mitigated by preventing construction traffic travelling through Horningsea<sup>91</sup>'.

**Recommendations**

- 1 This should also be afforded to Fen Ditton, High Ditch Road and Ditton Lane, each of which already have weight restrictions.**
- 2 Further, measures should be put in place to prevent operational traffic travelling through either village."**