

Save Honey Hill Group

Comments on Cambridge Waste-Water Treatment Plant Relocation Phase Two Consultation

Members of Save Honey Hill Group welcome the opportunity to comment on the proposals in the statutory Phase Two Consultation as set out in the CWWTPR Document Library. While we are keen to engage with AW for mitigation, we do this without prejudice to our stated aim to stop the relocation to Honey Hill as there is no operational need to do so¹, the housing proposed for the vacated brownfield site can be met elsewhere more quickly than the planned availability of the site in 2028, and there is not a proper planning basis for this proposal.

While the comments here are representative of the views of the group, individual members may also make their own responses. We welcome the fact that residents of a wider geographical area in North Cambridge have been consulted in this Phase. Comments to us from some of these residents are also included here.

We recognise that not all surveys have been completed and that technical reports which would better inform our responses to the proposals are not yet available. We therefore recognise that proposals may change considerably before the Phase Three Consultation and reserve the right to comment more fully at that time.

The questionnaire asks which environmental issues relating to the project are important to us. As all are of equal importance our comments are set out under specific issues but not necessarily in the order in which they appear in the questionnaire.

1. Design and Visual Impact

Designs for recent Waste Water Treatment Plants (WWTPs) elsewhere have aimed at achieving solutions which can neither be seen nor smelled, such as Southern Water's Peacehaven plant², Thames Water's Deepham's WWTW³ and Southern Water's Eastbourne plant⁴. Why is this not the case here or why is it not being demonstrated how this is to be achieved?

1.1 Design concept By using a mound or bund to partially screen an excessively intrusive development of urban design, the size, shape, and siting are defined. There is little information relating to the criteria used to assess and choose this option. There is no evidence of the pros and cons of other options and, if they were considered, on what grounds they were dismissed. The lack of proper feasibility studies was raised during the site selection process (Phase 1) but have not been addressed since. The Public Services (Social Value) Act 2012⁵ requires those in public procurement roles to consider how they can secure wider social, economic, and environmental benefits from their activities. These do not appear to have been demonstrated in

¹ <https://data.gov.uk/dataset/Of76a1c3-1368-476b-a4df-7ef32bfd9a8b/urban-waste-water-treatment-directive-treatment-plants> (UWTD; 91/271/EEC) 2016

² <https://www.water-technology.net/projects/peacehavenwastewater/>

³ <https://www.thameswater.co.uk/about-us/investing-in-our-region/deephams>

⁴ <https://www.southernwater.co.uk/water-for-life/improvements-in-your-area/sussex/eastbourne>

⁵ [Integrating-Social-Value-into-the-Planning-System_FINAL_170621.pdf \(socialvalueportal.com\)](#)

this proposal. Other “facts” on which site selection during Phase 1 were based, appear to have changed. This includes the size of the facility, originally stated as 22ha, but now stated in a recent e-mail as “the 22ha required for the facility does not include the 9ha circular earthwork bank”⁶. A single landscape site masterplan has been presented which does not allow us to comment on alternative options that may have been more suitable. These would allow more choice to be made to mitigate what would become the most prominent, if inappropriate, welcome to the City of Cambridge when approached from the east.

1.2 Biodigesters The dominant feature of the site will be the two biodigesters which, if 26 meter high in a flat fenland setting, would change the character of the area and impose an industrial appearance on a Green Belt location. We do not want to see the stacks above the bund. Even more preferable would be to sink the stacks and other buildings. The proposals for mitigation of visual intrusion need a wider consideration of visual receptors. Intrusion will occur under both in daytime and at night if the plant is lit and under summer and winter conditions; therefore, all four cases must be included in the mitigation plan.

The main visual receptors at ground level are at Biggin Abbey Grade II*, Biggin Cottages, Poplar Hall, Grade II, Poplar Hall Farm, the houses at the southern end of Horningsea Road and the houses on the eastern end of High Ditch Road, each containing further listed properties. In addition, non-residential visual receptors within 1km of the site area include users of the countryside, an extensive network of public rights of way and users of Horningsea Road and High Ditch Road. Visual receptors at any height equivalent to a first-floor house level are much wider and include Clayhithe, Quy, Horningsea and Fen Ditton. It is our view that the number of visual receptors within 1km of the site area and the sensitivity rating awarded to them are under-represented in AW’s assessment reports to date and should receive greater reference in the presentations and discussion of mitigation measures. A survey, conducted by Save Honey Hill members in April 2021, of visual receptors within 1km of the site area and their sensitivity rating is included in Appendix 1. The eastern approach to Cambridge on the A14 road will provide the sewage works as the first major view of the historic city. The towers are shown towards the edge of the site; they will be easier to conceal if at the centre.

1.3 Entrance The proposed Discovery Centre and imposing Gateway further add to the industrial nature of the approach and counters the attempt to harmonise the structure by screening and landscaping. Locating any Discovery Centre and associate parking within the bunded area is preferable to them being outside. A less obvious Gateway would reduce cost, both in terms of money and carbon footprint. While we understand Anglian Water’s pride in their development and their wish to give it a strong sense of identity, this is incompatible with the aim to enhance the natural environment. It will not sit sensitively within the local landscape character. A lower key design at the entrance would be more appropriate.

1.4 Bund The man-made bank at 7m high will only partially obscure the biodigester towers. The computer-generated pictures are based at 15 plus years. In the interval, minimal screening will not obscure the towers or soften the wall-like appearance of the bund. AW has confirmed that the path along the bund would be for the use of invited visitors⁷. It is unlikely that people visiting the site or countryside would enjoy such a path where any odour will be obvious. The bund will not be comparable to the existing hill forts in the Cambridge landscape such as the linear earthen barrier of Devil’s Dyke beyond Stetchworth⁸ of Anglo-Saxon origin which has

⁶ e-mail response from CWWTPR to question from SHH member 10 August 2021

⁷ AW e-mail to SHH member 10 August 20221

⁸ https://en.wikipedia.org/wiki/Devil%27s_Dyke,_Cambridgeshire

extensive chalk grassland, areas of woodland and chalk scrub. Fleam Dyke is rectilinear and very broken up, the highest point being 8 metres. The multivallate hillfort at Wandlebury Camp survived from the Iron Age, was built on an existing hill and the inner ditch was back filled in the 17th Century to level the ground for gardens. Situated in the very different rolling landscape of the Gog Magog hills, it is hardly a reasonable comparison with the bizarre appearance of two towers sticking out above an earth bank on flat fenland⁹. However, to prominently top it, for its entire circumference with an equally high metallic fence creates an industrial structure on a massive scale which looks alien and negates the value of the bund put to maintain the openness of the green belt. It has the characteristics of a giant inverted pastry cutter.

Softer screening with mixed, deciduous and evergreen, mature trees from the outset would provide a more natural appearance than the proposed metal fence.

1.5 Screening Some critical screening areas, such as the northern end of Horningsea Road (B1047), are based on land currently not in Anglian Water's control. It will require screening with already matured trees to produce the effect in the illustration (p18). This also applies to the views from Low Fen Drove and Fen Ditton. The computer-generated views are taken from ground level while the impact will also be felt from any higher location such as the upper floor of houses, the bridge over the A14 on Horningsea Road, the bridge over the disused railway line on High Ditch Road and the churches at Horningsea and Fen Ditton, both of which are on raised land. Further extensive and critical ground level views within 1km of the site are from High Ditch Road and footpaths to the north, east and west, none of which have been featured in the visual mitigation measures.

1.6 Pipelines You have advised that the pipeline from Waterbeach village and the New Town will need a pumping station¹⁰. You have advised by e-mail¹¹ that the cost of the pipeline will not be met as part of HIF funding. Please confirm that the cost of the pumping station will also not be met out of HIF funding. The pipeline has to run under the River Cam and in the vicinity of private water supplies and there is the inevitable likelihood that there will be untreated sewage leaks into the environment. Other pipeline routes should be investigated to prevent this hazard. More details are needed on the outfall structure to the River Cam and the discharge chamber next to the River Cam should be more in keeping with that rural area. Tunnelling should be arranged from Honey Hill to Cowley Road so that all excavated materials arrive by tunnel and not by road.

1.7 Tunnel You have advised in webinars that the method of tunnelling between Milton and the proposed site is not yet fixed but could be by tunnel boring machine (TBM) or by a series of pipejacks. Whatever the method, the length of tunnelling from a new site should be maximised such that the number of Heavy Goods Vehicle (HGV) movements needed to transport excavated material to the bund can be minimised. Furthermore, material from any other pipejack sites should be considered for reuse elsewhere since our calculations suggest the tunnelling makes a modest contribution to the amount needed to create the bund.

1.8 Technology As with other surveys, Technology options are not available for this consultation. The method presented, with its implications for the structures, odour and size, is not fully justified and further technological options should be presented. Without the best technological solution, the aim to be net zero and reduce carbon during construction phase cannot be achieved. This includes the wider implications of sludge spreading where more advanced treatment might

⁹ <https://historicengland.org.uk/listing/the-list/list-entry/1009395>

¹⁰ Para 15:CWWTPR – Statement-of-requirement.pdf

¹¹ AW e-mail to SHH member 19 July 2021

contribute more to the feasibility of energy generation. Details of solar energy production are not available and more information on the area, number and position of solar panels is needed. AW's proposals to offset the carbon cost of so much cement and steel etc. for the proposed new works are needed.

1.9 Space Proofing AW should demonstrate that the proposed layout of the WWTW allows for the centralisation of the more visible and odiferous parts of the plant so that such elements can also be accommodated centrally if there is a foreseeable need for them to be added later as a result of, say, growth or change in discharge standards.

2. Odour

2.1 Odour modelling This appears unchanged since Stage 4 Final Site Assessment in the Phase One Consultation. This is a limited theoretical model, the methodology leaves little confidence in its accuracy, it is limited by the software used to calculate the odour contours and data input. It does not account for real time complaints/observations during current operations outside of the existing plant and or during the meteorological years from which data was abstracted.

Trees, which are understood to be important for odour dispersal, were factored into the original odour model presented at Stage 4. However, this will not be effective until trees have matured in about 15 years. Odour modelling for 1-3 yrs; 3-5yrs etc. would be more useful. It is not clear what impact the bund will have on the odour dispersal or what the introduction of air holes will make.

We know the current Odour Model for the existing plant is inaccurate during normal operations as for example, when the wind is in the North odour from the existing plant is often experienced in Green End, Fen Ditton. This area of Fen Ditton falls well outside the current Odour Model contours for the existing plant. The odour model for the new plant is based on the same 2017 plant survey data, identical local meteorological data for the year 2013 and the same computer software ¹².

Further, the Odour Model is based on normal operations and does not predict outcomes in strong wind or extreme weather conditions such as extreme heat and heavy rainfall as witnessed nationally over the last two-three years. The meteorological data used is for the years 2012-2016 and therefore does not represent recent current extreme weather experiences.

AW has stated that odour modelling continues to be carried out in order to deliver the lowest, 'negligible' level of odour impact at receptors such as people's homes and existing walking or cycle routes, as it is defined in the Institute of Air Quality Management (IAQM) guidance. However, it is not possible for us to assess what "negligible" levels means and more details would be helpful before the PIER is published at Phase 3.

2.2 Odour receptors There is a reference to 500m boundary of 'negligible odour' (1.5-unit odour outline) to be established around residencies. However, changes in wind direction and more adverse weather conditions are likely to impact pedestrians, residents, and businesses. It is of note that a 600m odour buffer zone to any residencies is referenced as existing at the current site

¹² <https://www.greatercambridgeplanning.org/media/2281/addendum-report-updated-odour-dispersion-modelling-for-cambridge-water-recycling-centre-2020.pdf>

in the HIF Business Case¹³. Further, an odour contour of 1 unit, which would extend beyond the proposed site area, would according to the model used, still be experienced by 50% of people. Extending the odour buffer to 600m of residencies and public amenity areas and seeking an odour unit of 1 at the site boundary would increase public confidence in AW's stated commitment to minimising odour nuisance.

2.3 Odour impact The effect of odour on respiratory conditions, mental well-being, and autism¹⁴ are known. More work needs to be undertaken to measure and attenuate the impact on Fen Ditton Primary School, residents of Biggin Abbey and High Ditch Road and visitors to Low Fen Drove. As above (2.2), it is our view significant odour receptors exist well beyond the odour model shown, these have been underestimated in number and should be awarded a high sensitivity rating. Of those listed by AW, we believe the odour sensitivity rating has been underestimated.

2.4 Pipeline septicity More information is needed on the possibility and prevention of odour seepage from septicity in the tunnels and pipelines connecting to the proposed site¹⁶.

3. Traffic and pollution

3.1 Construction Phase A temporary site entrance during the construction phase, which is not the agreed permanent access, is contrary to usual large site management. No Construction Environmental Management Plan (CEMP) has yet been submitted. The choice of construction traffic access and route should be delayed until a decision has been made for the permanent access.

3.2 Construction access The proposed access at the A14 junction 34 and B1047 (Horningsea Road) would pose a threat to the Greenways project and the already established cycle and pedestrian route. The increase in traffic at this junction during the four years of construction would heavily impact the village of Horningsea. It will also impact traffic travelling south from Waterbeach New Town to access North and East Cambridge and traffic from Cambridge and Fen Ditton travelling north to access the A14 westbound and the possibility of tailbacks onto the A14. With 200 to 300 HGV movements daily during peak phase of two and a half years, plus light delivery and worker traffic, the impact on a rural road, the surface of which has previously been poorly maintained, will be significant and change the whole character of Horningsea.

During site surveys in July 2021, lorries carrying survey equipment have been seen travelling south on Horningsea High Street to access the site at Snout's Corner.¹⁷

The construction HGV flows appear to be above the threshold set out in the EPUK/ IAQM guidance¹⁸. Further assessments are therefore necessary.

We strongly advocate that a Permanent A14 dedicated site access route is used for the Construction Phase access (Permanent Option 3).

¹³ HIF Business Case HIF/ FF/ 000069/ BC/ 01 CNFE p10 Para 1

¹⁴ https://www.nature.com/articles/s41593-017-0024-x?WT.feed_name=subjects_neuroscience

¹⁵ <https://onlinelibrary.wiley.com/doi/abs/10.1002/jem.38>

¹⁶ <https://www.edie.net/library/Septicity-in-sewage-and-sludge/2013>

¹⁷ e-mail notification to Project Manager AW 12 July 2021

¹⁸ <http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf>

3.3 Permanent access routes Both options 1A and 1B and Option 2 will cause traffic disruption, both during construction and operational use, change the character of the Green Belt, Conservation Areas and value of public amenities, have huge cost implications and cause pollution with health implications.

3.3.1 Option 1 Horningsea Road/A14 Jnct. 34 The construction of traffic entrance on Horningsea Road and its closeness to Biggin Abbey appears to be in contravention of the 500m buffer zone specified in the Phase 1 Consultation Protected and Statutorily Designated Heritage sites¹⁹. This entrance would be within 0.4km of Biggin Abbey II* listed building and 0.3km of the Baits Bite Conservation Area. Horningsea village has Conservation Area status with many listed buildings. The Conservation Area is within 0.6km of this entrance and has listed properties within 0.7km. According to Cambs. County Council Highways officer, Horningsea Road, southward from the north of the bridge, is a Classified unnumbered road: C210. It is a small local road, not designed to do more than connect a village to the rest of the road network. The Planning Inspectorate said Horningsea Road 'has the character of a rural lane'. It would be terribly destructive of its local rural nature, with impact on two Conservation Areas, to turn it into a junction for HGVs. Development on this junction and any use of the classified minor Horningsea Rd (A14 to Horningsea Village) will bring excess traffic and disruption to what is otherwise a relatively quiet rural approach to the village of Horningsea and Baits Bite Lock, including public footpaths and public amenity areas in the vicinity of Low Fen Drove.

We predict HGV access to the site from Horningsea Rd would also bring new HGV traffic down Horningsea Rd towards Fen Ditton and along the B1047 despite weight restrictions.

Children and parents use the cycle and pedestrian route to school at Fen Ditton Primary. The school bus was discontinued when the cycle path was upgraded, and crossings installed across the A14 slip roads. It is a designated Greenway.

We consider Options 1A and 1B are unacceptable and cannot be considered 'mitigation' because they do not adequately protect the villages and local road users, cyclists and pedestrians, and provide for the management of site access and site HGV traffic.

3.3.2 Option 2 High Ditch Road is of historical significance forming part of Fleam Dyke, an ancient archaeological feature and heritage of Fen Ditton, a conservation village. Fleam Dyke also having formed the village name, Fen Dittone, meaning 'village by the ditch'. Fen Ditton Village has conservation area status with many listed buildings, a number of which are on the village approach on High Ditch Road. A site entrance at Honey Hill Bridge would be within 0.9km of the Conservation area and 1.0km of listed buildings.

High Ditch Road is a minor road with rural quality and charm and is of high public amenity value. It provides a stunning vista over the Honey Hill area on approach to the village and a charming rural approach/exit for cars and cyclists. Developing this road to accommodate the number of HGVs predicted, would have a negative and irreversible impact on the landscape, views, character, appearance and approach to the adjacent conservation area and land of historical and cultural significance, all of which is contrary to planning policy.

Further, Honey Hill Bridge, built to carry Low Fen Drove, a minor road in part Byway, across the A14, is a public access route for pedestrians and cyclists. This is used for recreational purposes

¹⁹ [500m buffer Heritage Ph 1](#)

round through to Horningsea Rd, where footpaths to and from the River Cam are accessed. A popular alternative after crossing the bridge is to pick up the dismantled railway line (with permission of the landowner) to access the network of footpaths in and around Quy Fen and Anglesey Abbey (NT). It is disingenuous to lump the predictable high cost and disruption to the A14 needed for doubling Low Fen Drove and a new bridge as "... significant improvements to the highway network ..." (Phase 2 Leaflet p26) whereas cost risk and A14 disruption are specifically included as negatives against Option 3. It is also disingenuous to avoid specific mention of the disruption and delays due to HGV use and proposed junction improvements on Newmarket Road during its modification and long-term use. Re-engineering this bridge to accommodate the volume of HGV traffic etc. would clearly remove access to, and quality of, an existing public amenity of high recreational value during its modification.

3.3.3 Option 3, a new junction on the north side of the A14, would minimize the impact of HGVs on the wider highway network, would have less environmental impact and less impact on the Green Belt than the other two options. We would suggest cost and programme risks and challenges should be managed such that they are no greater than presented by the other two options. Overall cost and programme for Option 3 are likely to be smaller than Options 2 or 1 which involve major construction/modification of a bridge on Low Fen Drove from High Ditch Road and junction modifications from Newmarket Road or major changes at the A14 junction 34. Option 3 would produce slightly less total traffic mileage to and from site than Option 2 and therefore less operational carbon.

We strongly suggest further discussion with the Department for Transport, Highways England, and Cambridgeshire County Council Highways Department to select this additional junction. There are precedents for such dedicated routes such as those to farms on the Harlow to Saffron Walden stretch of the M11, the access and egress on the A505 for Cambridgeshire County Council's Highways Department at Whittlesford, the Biogas plant off the A505 east of Baldock, toilets and car park layby on eastbound A21 4km and access to Amey Recycling Plant on A10.

4. Impact on environment

4.1 Green Belt The proposed site will cause irreversible damage to the Green Belt with threat to adjacent SSSI location at Quy Fen. Reduction of recreational facilities will increase the urbanisation of and around Cambridge. It is illogical to reduce and degrade the green belt in an area adjacent to where the greatest growth of Cambridge is being planned. The removal of the important gateway to National Trust's Wicken Fen Vision and the impact on wildlife, both by night and day, will be difficult to remedy. While most of the paths already exist, the proposed bridleway will depend on the permission of another landowner, as will the rewilding ambitions. The site needs to be as small as possible, sunk as deeply as possible and covered where appropriate with vegetation roofing where not used for solar panels.

4.2 Provision of new green spaces This is a somewhat dubious claim as the current green space will have a large industrial site built on it. The site it replaces at Cowley Road will be urbanized with a shortage of green space. For the residents of the proposed high-density housing there will be a loss of Green Belt recreational provision and the proposed new footpaths are within the odour impact zone.

4.3 Carbon footprint While the goal is to reach net zero carbon emissions by 2030, the carbon footprint due to the decommissioning, move and decontamination of the old site has not been included. For example, the use of one million tonnes of concrete equates to approximately

80,000,000 kg of CO₂. There is no evidence of research into the use of building material with a lower carbon footprint. We suggest that a more realistic estimate of the carbon footprint produced by the move, build and decommissioning, together with that of the heavy goods vehicles and support vehicles should be made available and alternatives considered. This more realistic estimate would then give a better indication of what is needed to offset it.

The recently published Intergovernmental Panel on Climate Change (IPCC) Report ²⁰ shows that global warming has already impacted natural and human systems with increased flooding, forest fire destruction and loss of some ecosystems. It warns that reaching and sustaining net global anthropogenic CO₂ emissions is necessary to halt global warming. There must be more evidence of Anglian Water's plan to reduce and offset carbon emissions and in a tighter timescale.

4.4 Biodiversity Although this area is mostly agricultural, there is, nevertheless, evidence of valuable biodiversity with a range of flora and fauna especially at the margins and at the disused railway line (partly a Country Wildlife Site [CWS] designation). This includes roe deer, badgers, foxes, voles, bats, birds, invertebrates, and rare bees. The introduction of woodland and wetlands may not be appropriate or maintainable in fenland, so the wetlands maybe a necessary part of the technology. More detail is needed on the method and resources needed for regenerative farming and whether support will be given to current owners and tenants to achieve this or whether this will be part of services provided by Anglian Water. The area of South Wicken was identified as an important section of Green Belt and a 'priority area' in 'The Cambridge Nature Network' report²¹. A net biodiversity gain of only 10% is insufficient and contrary to SCDC Doubling Nature strategy²².

4.5 Light and pollution and noise disturbance Maintenance of the site throughout 24 hours and light emissions from HGVs and light traffic during construction will impact on nocturnal habitats. The desk-top modelling used in the Phase One consultation needs to be extended to investigate the effect on bats, moths, owls, and rodents by light pollution. Badger setts have been identified in the area, otters are seen on this stretch of the Cam, deer and foxes are frequently seen; all will be disturbed by construction.

4.6 Water sources The site is underlain by the lowermost strata of the Chalk Aquifer. The Chalk is classified as a principal aquifer and is therefore protected by law from contamination, whether the ground water is used or not. Groundwater passing beneath the sewage works will undoubtedly suffer contamination originating at the works during the long-anticipated lifetime. This could occur due to a rare unplanned event or as the result of deterioration of any engineered protection over time. Contaminated ground water in the Chalk aquifer beneath the site would pollute three receptors: protected rights (local well users), parts of the surface drainage network, and Stow cum Quy Fen, a Site of Special Scientific Interest. Some residents in Horningsea are dependent on wells for their water supply. AW should place their reports on these issues on their website

While the CWWTPR Flood Risk Factsheet claims the site is in an area of low risk from surface water flooding, the Environment Agency's Long Term Flood Risk Map shows a high risk, i.e. chance of flooding greater than 3.3% at the adjacent area of Three Cornered Plantation and in a

²⁰ <https://www.ipcc.ch/sr15/>

²¹ 'The Cambridge Nature Network: A Nature Recovery Network for Cambridge and its Surrounds, Final Report', The Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, March 2021

²² <https://www.scambs.gov.uk/media/16837/corrected-digital-final-doubling-nature-strategy.pdf>

line northwards parallel to Horningsea Road²³. Flooding would contribute to ground water contamination of the chalk aquifer. A wider plan is needed to increase water reuse. There is insufficient information on Sustainable Drainage Systems (SuDs) and drainage proposals, especially in relation to increased flooding in the area.

5. Impact on local amenities

5.1 Character The dominant feature of the Honey Hill area is that of flat, agricultural land with paths, including National Ways, accessible to residents and visitors. Positioning a large industrial unit within it removes that local amenity and deprives those people of an important feature for recreational use.

5.2 Size and position The proposed bank and landscaping cannot disguise the site. It will change the character of the southern area of Horningsea and the setting of three Conservation areas. If cost and geology were not an issue in the choice of this site, then building the biogas digesters below ground or building more would make it less obvious. The proposed bridleway link from Low Fen Drove to Station Road, Quy, along the old railway line, is outside the area of control of Anglian Water. Unless odour is reduced considerably it is unlikely to succeed as a recreational area.

6. Impact on local communities

6.1 The communities The proposed location lies between Horningsea to the north, the proposed Construction and Option 1 entrance being 500m from the village, and Fen Ditton to the south. However, it will also impact the villages of Quy and Teversham. The health and well-being of recreational users, residents, primary school users, local businesses, including Garden Centre, pubs, restaurants, and small industrial units, will be impacted in these villages. Residents from the northern fringe of Cambridge who currently use the area for walking, cycling and horse-riding will also be affected. Quality of life will be negatively impacted by odour, noise and pollution from traffic, the loss of a tranquil area and light pollution from construction and operation. The only long-term mitigation can be shorter, sunken stacks and buildings, a smaller footprint and mature screening.

The only mitigation in respect of construction traffic impact is to use the Option 3 proposal for direct access from A14 between junctions 34 and 35. More detail and mitigation are needed on noise reduction methods, both during construction and operation, to reduce impact on residents.

6.2 Impact on conservation areas, heritage, and listed buildings A recent review by SCDC of the Conservation Area Programme has emphasised the importance of historic areas in South Cambridgeshire.²⁴ There will be adverse changes to the character and setting of villages with Conservation Area status and multiple graded properties within them. The presence of an industrial site in close proximity to listed buildings is out of character. The Conservation areas in Fen Ditton, Baits Bite Lock and Horningsea reflect a history dating back more than 800 years²⁵. Although the populations have fluctuated a little in that time, the size and character has not changed much and a large industrial site close by will have considerable detrimental effect.

²³ <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

²⁴ Minutes Cabinet Meeting 5 July 2021 [SCDC Agenda Item 4 Reports Pack](#)

²⁵ <https://www.british-history.ac.uk/vch/cambs/vol10/pp160-163>

Horningsea, especially, is a discrete rural village whose agricultural character, with barns lining the road at the northern end, is especially important where the linear nature of much of the village means that views to the open fields to the east can be seen from many parts of the village. Many houses and both public houses are listed buildings and the only other commercial complex centres on a Garden Centre. Fen Ditton is also an essentially linear village with a rural feel and a high proportion of good quality buildings and spaces and is bordered by the River Cam to the west and by fenland to the east. High Ditch Road has several listed buildings before crossing the old railway track and reaching one of the proposed entrances to the site at Long Fen Drive. The proposed site entrances are within 0.9km, 0.3km, 0.6km respectively of the three Conservation Areas.

A development of the size and appearance proposed is contrary to South Cambridgeshire District Council (SCDC) Policy Horningsea Conservation Area (DCV 0030)²⁶, SCDC Baits Bite Lock Conservation Policy (DCV 0040)²⁷ and SCDC Policy Fen Ditton Conservation Area (DCV 0029)²⁸.

It is therefore important that the mitigation that would be provided by AW avoids degrading the conservation and historic nature of the parishes, whether due to odour, traffic, visual intrusion or any other reason.

7. Next steps

So many details, which will direct final decisions on design, traffic routes and orientation of plant, are unknown until surveys have been completed. It is, therefore, difficult for those responding to the consultation to have meaningful input. We suggest that technical reports should be made available immediately on their completion so that residents can have more involvement in decisions before the Phase 3 Consultation. Only then might a plant in keeping with Cambridge's acknowledged standing be provided for the long-term future.

We understand that the Environmental Impact Assessment Scoping (EIAS) request will be available to the Planning Inspectorate around 4 October 2021. We ask that we have access to the EIAS request, and the discussions held prior to the request, between Anglian Water and the local planning authorities.

There is no need to release this area of Green Belt; exceptional circumstances have not been established and it is against the National Planning Framework. We, therefore, ask that before more harm is done to the environment and to the economy, the developments at North East Cambridge and the proposed relocation of the WWTP should be considered together and reviewed in the light of post-Covid working and living conditions.

Margaret Starkie
For Save Honey Hill Group
16 August 2021

²⁶ https://www.scambs.gov.uk/media/9008/horningsea_0.pdf

²⁷ <https://www.scambs.gov.uk/media/7373/baits-bite-lock.pdf>

²⁸ https://www.scambs.gov.uk/media/8523/fen-ditton_0.pdf

Appendix 1

Visual Receptors – CWWTPR Selected Site Area – Honey Hill 05/05/21

Visual Receptors identified in April 2021 are tabled below, at this time there was partial leaf coverage within the landscape, a survey during winter months may reveal more visual receptor sites. The receptors have been limited to within approximately 1.km of the Site Area as identified by AW in the Stage 4 documentation. An approximate minimum distance from the Site Area is listed, the conservation area setting is identified, and each receptor given a Visual Sensitivity Rating according to the criteria set out in Table B. 10 (AW Stage 4 Appendix B Environmental Assessment). Notes supporting the Table are below. A number of maps/tables accompany this document in a separate file including footpaths; conservation areas; parish boundaries; CWWTPR Site Area; Visual Sensitivity Rating scale: Visual Receptors Maps ii. pptx and are useful for illustration. Photographs as supporting evidence from a number of sites are available but have not been included here.

AW Site Area Visual Receptors – Identified April 2021	Conservation area	Approx. distance	Visual Sensitivity rating
PRoW - see notes			
Users of National Cycle Route No.11 looking East	Y	1.0km	High
Users of off-road Cycle Route and footway B1047 looking East (forming Horningsea Greenways)		0.5km	High
Users of riverside footpath 162/1 looking East	Y	1.0km	High
Users of footpath 85/3 looking North East	Y	0.8km	High
Users of footpath 85/6 looking East - Harcamlow Way & Fen Rivers Way	Y	0.8km	High
Users of footpath 85/5 and Byway 130/3 Field Lane looking North East		0.8km	High
Users of footpath 85/8 looking East	Y	0.3km	High
Users of footpath 130/1 looking South East - Harcamlow Way & Fen Rivers Way	Y	0.8km	High
Users of footpath 130/2 Looking East	Y	0.7km	High
Users of Byway 85/14 Looking West		0.8km	High
Users of footpath 130/6 Looking South		0.7km	High
Users of footpath 130/7 Looking South West		0.8km	High
Users of footpath 85/12 Looking South West		0.8km	High
Users of footpath/Bridelway 218/5 Looking South West		0.7km	High
Users of footpath 85/15 looking South West		0.8km	High
User of footpath 218/2 Looking North West - Harcamlow Way		0.8km	High
Users of the River Cam – rowing, leisure craft etc. looking South East	Y	0.8km	High
Roads - See Notes			
Users of High Ditch Road - Classified as Minor	Y	0km	High
Users of Horningsea Rd - Classified B1047	Y	0km	High

Users of Low Fen Drove		0km	High
*Users of disused railway track - Low Fen Drove to Station Rd, Quy		0.4km	High
Conservation Areas - See Notes			
Horningsea	Y	0.4-0.5km	High
Baits Bite Lock	Y	0.4km	High
Fen Ditton	Y	0.5km	High
Listed Properties - See Notes			
Quy Water Mill Grade II Hotel, Gym & Wedding Venue Business Newmarket Rd Quy	Y	0.5km	High
Quy Hall Grade II Station Rd Quy - Residential	Y	0.8km	High
Lodges to Quy Hall - Residential	Y	0.8km	High
Home Farm House Grade II* - High Ditch Rd Fen Ditton -Residential	Y	0.8km	High
Mulberry House Grade II - High Ditch Rd Fen Ditton -Residential	Y	0.8km	High
No's 15 & 17 High Ditch Rd- Grade II High Ditch RD Fen Ditton-Residential	Y	0.8km	High
Manor Farm House Grade II High Ditch Rd Fen Ditton -Residential	Y	0.8km	High
*Wildfowl Cottage Grade II Baits Bite Lock Fen Ditton -Residential	Y	0.9km	High
Biggin Abbey Grade II Horningsea Rd Fen Ditton-Residential	Y	0.5km	High
*Poplar Hall Farm Grade II Fen Ditton -Residential	Y	0.5km	High
The Plough & Fleece - Grade II Community PH Grade II Horningsea	Y	0.8km	High
St Mary Virgin Church Grade II* - Fen Ditton view from Tower	Y	0.5km	High
St Mary Church Grade II* - Quy view from Tower	Y	0.8km	High
St Peter's Church Grade I - Horningsea view from Tower	Y	0.8km	High
*Residents High Ditch Rd , Fen Ditton- Looking East Opposite Low Fen Drove Way approx 6		0.1km	High
Residents of High Ditch Rd, Fen Ditton Looking North East approx 30	Y		High
Residents of Horningsea Rd, Fen Ditton Looking North East approx 30			High
Residents of Musgrave Way, Fen Ditton looking North East approx 10			High
Residents of Green End, Fen Ditton looking North East approx 6			High
Residents of Stanbury Close, Fen Ditton looking North East approx 12			High
Residents of High Street , Horningsea Looking South approx 10	Y		High
Residents of Clayhithe Road, Horningsea Looking South approx 6	Y		High
Residents of Station Road, Quy looking South West approx 3			High
Residents of property Low Fen Drove 1		0.4km	High
Businesses			
Francis Court , High Ditch RD approx 6 Offices	Y	0.8km	High

Scotsdales Garden Centre High Street, Horningsea		0.5km	High
Gayton Farm Campsite, Clayhithe Rd, Horningsea		0.5km	High
The Plough & Fleece - Grade II Community PH Grade II Horningsea	Y	0.8km	High
Quy Water Mill Grade II Hotel, Gym & Wedding Venue Business Newmarket Rd Quy	Y	0.5km	High
Open Scenic Areas			
Fen Ditton Recreation Ground	Y	0.8km	High
Fen Ditton Primary School Grounds		0.5km	High
*NT Anglesey Abbey Grade II & Gardens		1.2km	High
National Trust Land & footpaths adjacent to Quy Fen/Anglesey Abbey		1km	High
*Quy Fen SSSI		1km	High

NOTES

Footpaths

Footpaths from where the site area cannot be seen as a result of vegetation or other screening at the time of the survey have been excluded. Some footpaths view the site area throughout, others where there are 4–5-meter gaps in vegetation at intervals. The impact on the character of the landscape as viewed from these footpaths is considered to have a significant negative impact on the amenity value.

Roads

High Ditch Road

High Ditch Road is a narrow minor rural road with open landscape views over Honey Hill, is of historical significance forming part of Fleam Dyke, an ancient archaeological feature and heritage of Fen Ditton, a conservation village. 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 and listed buildings within. The changes to High Ditch Road and Honey Hill Bridge over Low Fen Drove (currently designed for farm vehicles only) as proposed by AW to accommodate operations of the site including 140 HGV vehicles a day, will be viewed and experienced by users of High Ditch Rd and will have a very severe impact on the setting, character and appearance of the Conservation Area and historical heritage of High Ditch Rd. Users of High Ditch Rd include recreational cyclists.

Horningsea Road - C210

Horningsea Road forms a rural approach with extensive views of open landscape and Honey Hill informing the character and setting of Horningsea Conservation Area and listed buildings within. The view of the site area will be within metres of the road, the western boundary being roadside. The proposed use of Low Fen Drove for construction of the site with associated HGV vehicles and, in the case of an access route for operations, 140HGV vehicle movements a day, will be viewed and experienced by users of Horningsea Road and will have a very severe impact on the setting, character and appearance of the Horningsea Conservation Area, listed buildings within and character of the extensive landscape which forms its setting. Horningsea Rd includes a pedestrian path and off official off-road cycle way which will form the Horningsea Greenways route. The latter is within 0.2km off the site area.

Low Fen Drove – *Disused Railway Track

Low Fen Drove is a rural byway/bridleway from both Horningsea Road and High Ditch Road and is used by many cyclists and recreational walkers. For many years, with permission from Quy Estate, local residents have used the old railway track as a pedestrian and cycle route to Station Road, Quy and on into the network of byways and footpaths around Quy Fen. The latter completes an off-road route from Fen Ditton to Quy Fen. Quy Fen, an SSSI is historical common land shared and managed between the Parishes of Fen Ditton, Horningsea and Quy, the shared ownership and equity of access is reflected in the historic Parish Boundaries which culminate at Quy Fen. Changes to Low Fen Drove to accommodate construction and site operations will have a highly significant effect on the character of the landscape and amenity value of the area for recreational walkers and cyclists and will remove what has historically been an off-road access route to Quy Fen.

Conservation Areas

All 3 conservation areas, Fen Ditton, Baits Bite and Horningsea are within 0.5km of the site area and will have extensive views of it. Baits Bite Lock which extends north of Biggin Abbey may be 0.4km equally, Horningsea behind the Old Vicarage as little as little as 0.4km. Such proximity and views of the site area will have a very severe impact on the setting, character and appearance of these Conservation Areas and listed buildings within.

Listed Properties

Listed properties that have views of the site area have been included only. All listed properties however remain relevant in terms of the impact the site area and construction/operational traffic will have on the landscape, character, appearance and setting of them. In total Fen Ditton Parish contains 24 Grade II and 8 Grade II* listed buildings; Horningsea Parish 28 Grade II and 1 Grade I listed buildings; Stow Cum Quy Parish 14 Grade II and 3 Grade II* listed buildings (Ref. SCDC Planning Maps).

*These listed residencies are within 0.5km of the site area boundary, however the driveways which form part of the character and setting of the properties are within 0.2m, being off Horningsea Rd. Poplar Hall is set at a low level and is unlikely to view the site area, however the site area will be viewed on approach and exiting the property within 0.3km so is included here.

Residents*

These residents on High Ditch Rd lie directly at Low Fen Drove and High Ditch Road junction and view Honey Hill Bridge, which along with High Ditch Rd as above is proposed to be upgraded to provide access to the site for operations including 140 HGV movements a day. The change in appearance and usage of High Ditch Road and Low Fen Drove will have a very severe and detrimental impact on the setting and view from these properties. They also lie within 0.5km of the site area and will view it.

Businesses

The open landscape and view over Honey Hill form part of both Quy Mill Hotel and Gayton Farm Campsite business settings. Being within 0.5km of the site area will have a significant impact on their businesses. Quy Mill Hotel, offering outside bars and a wedding venue and Gayton Farm, camping.

Open Scenic Areas*

Anglesey Abbey & Gardens have been included here due to its importance and visual sensitivity to change. The viewing area extending out across the Fens is an integral aspect of the Gardens and looks directly through to the Honey Hill area. Quy Fen SSSI has been included here though at the time of the survey there was sufficient leaf coverage for the site area to be screened. A survey in the winter period would be required to clarify whether to include this area as a visual receptor.

Jennie Conroy – NT Member; Resident Fen Ditton; SHH Group member.