



# **Greater Cambridge Integrated Water Management Study**

Detailed Water Cycle Study  
Wastewater Addendum

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**Greater Cambridge Integrated Water Management Study – Detailed Water Cycle Study  
Wastewater Addendum**

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# 1 Introduction

## 1.1 Requirement for an addendum

1.1.1 Stantec UK Ltd was commissioned in 2020 by Greater Cambridge Shared Planning (GCSP) to prepare an Integrated Water Management Study (IWMS) to support the development of the emerging Greater Cambridge Local Plan which covers the area of Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC).

1.1.2 Stantec was commissioned to produce:

- A Detailed Water Cycle Study (WCS); and
- An update of the Level 1 Strategic Flood Risk Assessment (SFRA), and a Level 2 SFRA where necessary

1.1.3 The Detailed WCS and the Level 1 and 2 SFRA were published in October 2025 and were supporting documents to the Draft Local Plan. This Addendum should be read in conjunction with the Greater Cambridge Detailed WCS (October 2025) report.

1.1.4 The published documentation has been reviewed in light of comments received, including those from further engagement with stakeholders, and the fact that there is a fast-moving situation with regard to the development of the now statutory Anglian Water Drainage and Wastewater Management Plan<sup>1</sup> (DMWP28) and Government's interest in overcoming constraints and uncertainties surrounding the regional growth agenda.

1.1.5 This addendum supports the Proposed Submission (Regulation 19) Local Plan and updates or clarifies elements of the published WCS, explaining further what will be examined in the ongoing DWMP28 due to be published in November 2027 (Draft) and August 2028 (Final).

1.1.6 The Greater Cambridge Local Plan will inform the DWMP process. This addendum provides further details on the DWMP, and its role in planning for infrastructure that supports growth in Cambridge without detriment to the water environment. Defra's Water Delivery Taskforce is also now supporting all parties to make the accommodations, with safeguards that will give stakeholders confidence to support the Local Plan.

1.1.7 Stakeholders have also prepared a 'statement of common ground' (SoCG) that confirms their points of agreement and areas of remaining uncertainty, demonstrating their shared obligation to meet both growth and environmental obligations. The principal stakeholders (Anglian Water, Cambridge Water, Greater Cambridge Shared Planning (GCSP), Defra, Ofwat, Environment Agency, Cambridge Growth Company) also continue their collaboration through the auspices of the Cambridge Water Scarcity Group<sup>2</sup>.

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<sup>1</sup> <https://www.anglianwater.co.uk/corporate/strategies-and-plans/drainage-wastewater-management-plan>

<sup>2</sup> <https://wre.org.uk/cambridge-water-scarcity-group/>



## **Greater Cambridge Integrated Water Management Study – Detailed Water Cycle Study Wastewater Addendum**

1.1.8 Further, through the SoCG it is agreed that, subject to appropriate infrastructure planning, wastewater treatment capacity is not a barrier to delivering the level of development proposed in the Local Plan including the identified housing trajectory. The parties support draft policy requirements to ensure that infrastructure capacity is available or can be made available in time to serve proposed development. It is agreed that all parties will continue to work together to ensure the necessary wastewater infrastructure is planned for, and delivered, in a timely manner to support planned development.

1.1.9 It is recognised that unmitigated development would likely jeopardise the achievement of Good Ecological Status in receiving waterbodies because of the increased quantity of treated effluent that would be generated. However, Anglian Water's responsibilities will ensure that the development will be compensated for through increased capacity at Water Recycling Centres (WRC) and the treatment of wastewater to a higher standard. Where it is then still difficult to ensure that there will not be deterioration of river water quality, alternative disposal routes will be considered.

1.1.10 The phased development in the Local Plan and the accompanying development trajectory provides detail of where, and when, development at the allocated sites is anticipated to begin. This will be fed into the development of the new DWMP so that Anglian Water can account for in their wastewater infrastructure planning. The water environment is also safeguarded by Local Plan policy (Policy CC/IW: Integrated water management, sustainable drainage and water quality) which requires development proposals at the planning application stage to demonstrate there is capacity for wastewater treatment and adequate wastewater conveyancing infrastructure to protect and enhance water quality.



## 2 Principal issues

### 2.1 Government position

2.1.1 The Government continues to strongly promote the growth agenda in Cambridge and supports all stakeholders in reaching agreement for how this can be achieved. Matthew Pennycooke (Minister for Housing, Communities, and Local Government) issued a statement in October 2025 which stated:

*‘The Government has instructed Anglian Water to accelerate planning for wastewater infrastructure upgrades required to accommodate development and growth both now and for the Cambridge Growth Company’s long-term ambitions for expansion in Greater Cambridge’.* Anglian Water is responding to this instruction in parallel with its developing DWMP.

### 2.2 Drainage and Wastewater Management Plan

2.2.1 Anglian Water has a new statutory responsibility to bring forward a Drainage and Wastewater Management Plan in August 2028 (Draft in Autumn 2027) that will set out detailed and costed strategies to match infrastructure with demand whilst protecting the environment in the planning period 2030 to 2055, encompassing the period of the Greater Cambridge Local Plan.

2.2.2 This DWMP28 will take account of forecasts and trajectories of future growth, decide on a wastewater treatment strategy to meet demands and undertake water quality modelling assessments, discharge permit calculations and engineering appraisals regarding new or expanded WRCs. The Councils and the Environment Agency are key stakeholders in the development of this plan.

2.2.3 The DWMP will be required to demonstrate the best value approach to meet future demands (to 2055), address climate change adaptation and meet the expectations of all stakeholders, including the restoration and maintenance of Good Ecological Status in waterbodies. It will directly inform the Anglian Water PR29 Business Plan (for the period 2030 to 2035) through which medium term investments are committed to and financed and sets the ambition and direction of subsequent investment cycles. The period of the early to mid-2030s is critical because it’s then when the newly planned strategic develop sites identified in the emerging Local Plan are anticipated to begin delivery.

2.2.4 The purpose of the DWMP is to ensure that Anglian Water plans to provide the infrastructure needed to meet demand and protect the environment. This comprehensive exercise significantly exceeds the scope of the completed WCS and will address its outstanding but understandable uncertainties regarding the choices around wastewater treatment.

2.2.5 The DWMP will look explicitly at the consequences of planned growth on the existing wastewater infrastructure and subsequently on the receiving water system and report on any consequential breaching of permit conditions (dry weather flow, full flow to treatment, numeric conditions) and good ecological status in rivers. It will use the growth trajectories aligned with the Local Plan. The future performance against these



and other criteria (performance indicators) is forecast, with uncertainties, for 2035, 2045 and 2055 against a baseline of 2030. It will then bring forward solutions (e.g. new or expanded WRCs and effluent transfers) selecting the alternative solution(s) that deliver ‘best value’. This sets the location and timeline of investments necessary to stay ahead of demand, with flexibility to manage uncertainties. The DWMP is developed in parallel with a Strategic Environmental Assessment and Habitats Risk Assessment to identify constraints, particularly on the location and nature of new infrastructure.

## **2.3 Environment Agency position**

2.3.1 Representations from the Environment Agency on the detailed WCS considered that more detailed analysis of location specific risks was needed to confirm the wastewater generated from planned growth in Cambridge could be successfully treated in existing or newly constructed Water Recycling Centres (WRCs) and discharged into receiving waters whilst maintaining Good Ecological Status.

2.3.2 The uncertainty arises from an absence, at this time, of more detailed water quality impact assessments (water quality modelling) and firm proposals from Anglian Water demonstrating how they will meet this demand whilst ensuring that water quality outcomes are achieved.

2.3.3 It is acknowledged that there are difficulties in providing this additional level of detail ahead of DWMP28 completion, and that it is Anglian Water’s responsibility to undertake this planning with support from stakeholders. This planning responsibility extends to identifying when, in the future, wastewater permits will be exceeded and preparing for timely improvements that achieve and maintain, without deterioration, the expected water quality in local river systems.

2.3.4 The Environment Agency recommend that the WCS to be updated upon completion of the DWMP, as it should be maintained as a live document. An update could also refresh sections referencing Water Framework Directive 2025 classifications which will be updated in 2026.

2.3.5 The Environment Agency has provided specific comments to the Detailed WCS (2025) report, which are discussed in Appendix A where corrections and clarifications are provided.

## **2.4 Total Phosphorus Technically Achievable Limits (TAL)**

2.4.1 The WCS used a load-standstill approach to identify how wastewater environmental permits might need to be tightened in response to growth to achieve river quality objectives and prevent deterioration. This is an approximation of the analysis being undertaken by Anglian Water in its DWMP using the SAGIS-SIMCAT water quality modelling tool. Total Phosphorous entering the water environment is Cambridge’s most challenging wastewater / water quality constraint.

2.4.2 The load standstill approach assumes that percentage increases in population (defining the wastewater dry weather flow) must be matched by a corresponding percentage reduction in the concentration of discharged pollutants through treated final



effluent. This ensures that the pollutant load (volume X concentration) is held constant, and any planned water quality outcome is maintained.

2.4.3 The WCS included an assessment of the load standstill position relative to the 2030 application of new TAL permits following completion of Anglian Water's AMP8 investment programme. TAL are the minimum permits usually set, and are used to restore river quality to Good or Moderate ecological status.

2.4.4 Where forecast growth in each such affected WRC catchments exceeds the population implied by the 2030 Dry Weather Flow (DWF) permit, this growth cannot be accommodated straightforwardly unless one or more of the following strategies is applied:

1. Conveying some or all the wastewater to a different WRC where there is more dilution to receive treated effluent without causing deterioration.
2. Re-use of some or all treated effluent before it is returned to the river (e.g. for industrial uses or to augment water resources) subject to this not being detrimental to public health.
3. Application of advanced or novel technologies to support the setting and achievement of a sub-TAL permit.
4. Catchment management approaches that address sources of pollution other than from WRCs (e.g. agriculture) providing more 'headroom' for treated effluent disposal in the river
5. The phasing (slowing) or redirection of development such that local environmental impacts are negated until other measures are in place

2.4.5 The WCS (2025) analysis showed a risk of these challenges arising at the following water recycling centres because of a combination of growth and/or climate change effects: Cambridge WRC, Uttons Drove WRC, Sawston WRC, Bassingbourn WRC, Foxton (Cams) WRC, Guilden Morden WRC, Melbourn WRC, Over WRC, Teversham WRC and Barley WRC

2.4.6 Since the WCS approach only provides an approximation of these risks and has not considered in detail the mitigations listed (as this would have been speculative, impractical, and is the core function of the DWMP), it does not conclude that this growth pattern is unsustainable.

2.4.7 It does indicate that wastewater strategies in these locations will be more complex, and only on completion of detailed plans can unqualified assurance of feasibility be provided. This is a consequence, in part, of relatively large growth across a natural water catchment with modest river flows.

## **2.5 Cambridge WRC**

2.5.1 Local pressures are further complicated by decisions to halt development of the proposed new Cambridge WRC at Honey Hill after the withdrawal of Housing



Infrastructure Fund finance<sup>3</sup>, and plans to instead develop the existing Milton WRC site where there are ongoing compliance issues with existing environmental permits.

2.5.2 Anglian Water has now confirmed its plan to develop the existing Cambridge (Milton) WRC site and in parallel accommodate a transfer pipeline from Waterbeach WRC to Milton. The outline design for these solutions is underway, and construction is expected to start in 2028 subject to finance being agreed. The initial focus will be on restoring permit compliance, but subsequent phases will meet the growth ambitions of Cambridge through close cooperation with stakeholders.

## **2.6 Uttons Drove WRC**

2.6.1 Uttons Drove WRC continues to be an ongoing ‘pinch-point’ that needs resolution. It is notionally planned to serve the new Cambourne developments as well as Bourn Airfield, Slate Hall Farm and the ‘Land to the south of the A14 Services’ developments. It is already treating flows from the partially built-out development at Northstowe

2.6.2 The discharge of treated effluent here into a tributary of the Swavesey Drain is constrained not only by water quality impacts on this small watercourse but also by flooding concerns along its length. Its connection to the River Great Ouse is controlled by sluices at Webbs Hole that cannot operate by gravity when flows are high in the larger receiving waterbody. Some flow can be pumped downstream but otherwise flows back-up and heighten flooding risks.

2.6.3 Anglian Water continues to carefully define and understand the pace of these developments alongside stakeholders including the Councils, to develop a strategy for their wastewater provision here. This strategy will form part of the DWMP and will need to come forward with alternative destinations for new wastewater and/or new arrangements for conveyance through the Swavesey Drain system at all times of year. This strategy will need development in partnership with others such as the Swavesey Internal Drainage Board (IDB).

## **2.7 Additional wastewater destination uncertainties**

2.7.1 The Detailed Water Cycle Study (2025) highlighted that there is uncertainty about the destination of flows from new development which is still unknown. These development sites need further planning to determine the wastewater treatment strategy.

2.7.2 The new community adjacent to the A11 and A1307 at Grange Farm is a proposed standalone site that is not directly associated with any existing WRC catchment. As indicated in the WCS, and on advice from Anglian Water, this allocation could either be served by Sawston WRC, subject to a future growth scheme and associated permit requirements, or by a separate new onsite WRC could be delivered by the master-developer with the option for adoption by AW if specific design and operational requirements are met. An onsite solution would also require the necessary discharge permit to be agreed with the EA.

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<sup>3</sup> <https://www.cambridge.gov.uk/news/2025/08/15/government-decision-not-to-fund-cambridge-waste-water-treatment-plant-relocation>



2.7.3 Sawston WRC is also the likely destination of flows from the Wellcome Genome Campus, so improvements at that WRC will need to be carefully coordinated with the development trajectories of the new community site.

2.7.4 Flows from the Babraham Research Campus site are not likely to be routed to nearby Sawston WRC but, on advice from Anglian Water, instead handled through a new WRC or an improved existing campus WRC.

## **2.8 Cross-boundary wastewater transfers**

2.8.1 Wastewater treatment is currently undertaken at 33 Water Recycling Centres (WRCs) located within the Greater Cambridge region. There are also four cross-boundary treatment works<sup>4</sup> of which only Royston (North Hertfordshire) can be considered significant because of the level of development forecast:

1. the Royston WRC lies within the Greater Cambridge area, but treats wastewater generated in the Royston area of North Hertfordshire,
2. the Waresley WRC lies outside the Greater Cambridge area (in Huntingdonshire), but treats wastewater generated in the Little Gransden area of Greater Cambridge,
3. The Barley treatment works is in North Hertfordshire but treats wastewater generated in the Chishill area of Greater Cambridge.
4. The Great Chesterford treatment works is in North Hertfordshire but treats wastewater generated in the Ickleton area of Greater Cambridge.

2.8.2 The Anglian Water DWMP is structured around wastewater catchment and river basin geographies rather than political ones and will address these issues comprehensively.

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<sup>4</sup> Further information is included in Appendix A



## Appendix A Environment Agency representations (specific comments)

### 1. Comment reference EA1: WFD datasets

*‘Section 2.3.4, WFD - We note that the most up-to-date, available, information has been used in this WCS. Please be aware that 2025 classifications are due to be published this year in preparation for the next revision to the River Basin Management Plans (Cycle 4); we recommend the WCS be updated when revised classifications are released to reflect any revision since 2019. This will assist in decisions around suitability of development location and/or phasing requirements over the lifetime of the plan’.*

#### Stantec’s response to comment reference EA1

River basin management plans were last published in December 2022. The EA has now begun the process of reviewing and updating the next cycle plans. This would be the Cycle 4 of the RBMP covering the period from 2028 to 2033.

This is a statutory process and involves three public consultation steps. The statutory deadlines for launching these consultations are<sup>5</sup>:

- 22 December 2024 for the working together consultation
- 22 December 2025 for the significant water management issues consultation
- 22 December 2026 for the draft updated river basin management plans consultation

The statutory deadline for publication of updated plans is 22 December 2027.

### 2. Comment reference EA2: Cross-boundary WRCs

*Section 4.4.5 – ‘There are four identified WWTW that are cross-boundary. It is unclear if the assessments undertaken include known or planned growth in the neighbouring Local Planning Authorities (LPA) for those locations. There could be an impact on potential development delivery for GCSP if existing headroom is already taken by growth in those neighbouring locations. It is therefore essential that GCSP liaise with Anglian Water on an ongoing basis, as described in Section 4.9.19.’*

#### Stantec’s response to comment reference EA2

Section 4.4.5. of the Greater Cambridge Detailed WCS report (October 2025) noted that: ‘There are four cross-boundary treatment works included in this review for

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<sup>5</sup> [River basin planning: working together 2024: consultation response - GOV.UK](https://www.gov.uk/government/consultations/river-basin-planning-working-together-2024)



completeness and were also identified in the 2021 Greater Cambridge WCS report. These are:

- The Royston treatment works lies within the Greater Cambridge area, but treats wastewater generated in the Royston area of North Hertfordshire.
- The Waresley treatment works lies outside the Greater Cambridge area (in Huntingdonshire), but treats wastewater generated in the Little Gransden area of Greater Cambridge.
- The Barley and Great Chesterford treatment works are in North Hertfordshire but treat wastewater generated in the Chishill and Ickleton areas of Greater Cambridge respectively.

### ***Royston WRC***

The most recent Royston Sewage Treatment Works WCS was prepared in 2012<sup>6</sup>. It was identified that the proposed quantum of growth could lead to a significant upgrade to the WRC with a considerable increase in energy use and that this could affect the delivery of the proposed growth in Royston. The 2012 report concluded that, in order to demonstrate a workable solution, AW and the EA have agreed, in principle, that a technically feasible engineering solution can be delivered to accommodate all of the growth proposed for Royston WRC. Should a new permit be required in order to meet the requirements of the Water Framework Directive, this would involve a tightening of standards. This would necessitate a costly upgrade of Royston WRC with an initial estimate exceeding £3 million. Upgrading Royston WRC would require a lead-in time managed through standard processes such as temporary treatment or tankering. Once it was operating, there would be a considerable increase in energy usage for processing to meet the tighter standards.

The EA's position is that there is capacity for the properties coming forward (anticipated to be up to 2015 based on the housing trajectory provided by North Hertfordshire District Council). In order to accommodate proposed growth beyond this point a revised discharge permit for Royston WRC would be required. This would be to prevent deterioration in the receiving watercourse to comply with the WFD requirements. AW forecasted that there is, and will be, sufficient capacity to serve the proposed growth for the council's plan period. The onus would be on AW to maintain standards set within the environmental permit. Should the review of STW capacity identify compliance concerns, AW will apply for a revised permit and scope associated upgrades, should they be required.

This was also re-iterated in the North Hertfordshire Local Plan (2011-2031)<sup>7</sup> where it was noted that the EA and AW have agreed that, in principle, a technically feasible engineering solution can be delivered to accommodate all of the growth proposed, and that should a new permit would be required, to meet the WFD requirements, this would involve a tightening of the standards and would require a costly upgrade of Royston WRC.

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<sup>6</sup> [Royston STW Capacity Study Final Aug 2012](#)

<sup>7</sup> [North Hertfordshire Local Plan 2011-2031.pdf](#)



## Greater Cambridge Integrated Water Management Study – Detailed Water Cycle Study Wastewater Addendum

North Hertfordshire is currently preparing its new Local plan, which will be adopted in January 2029<sup>8</sup>. A Water Cycle study to support the emerging Local Plan is expected to be published in autumn 2027<sup>9</sup>.

The AW published DWMP 2023 identified that the long-term (2050s) strategy for Royston WRC is to undertake optimisation processes.

### **Waresley WRC**

Huntingdonshire District Council Stage 2 Water Cycle Study (November 2025)<sup>10</sup> does not indicate either the number of dwellings or the employment growth that should be allocated to Waresley WRC coming from the South Cambridgeshire area (refer to Table 3-3 in the report). However, the WCS noted that Cambridge City Council and South Cambridgeshire District Council (as well as the neighbouring authorities of Peterborough City Council and Bedford Borough Council), provided site information for use within the WCS report.

AW commented that *'within Waresley WRC catchment there is capacity for future residential growth proposed, but this is dependent upon wastewater flows from proposed commercial allocations and whether sufficient headroom will be available without further investment'*. Additionally, the WRC capacity assessment interim results in Table 5-8, show that Waresley WRC is likely to be close or exceed its permit during the plan period and that upgrades and/or a change to permit limit may be required. The capacity assessment did not identify any significant constraints, although it should be noted that the assessment could be subject to change after a modelling update. However, it is not clear whether this outcome is considering the proposed growth resulting from South Cambridgeshire District Council or is considering growth from Huntingdonshire District Council only.

### **Barley WRC**

No information regarding Barley WRC capacity was found in a recent WCS.

The AW DWMP 2023 notes that in the medium-term Barley WRC will include new process streams and a mixed strategy will be implemented, whereas in the long-term, surface water removal would be required.

### **Great Chesterford WRC**

The Uttlesford District Council Water Cycle Study Stage 2 was developed in 2024<sup>11</sup>. The study included the assessment of Great Chesterford WRC and noted that the WRC also receives flows from Greater Cambridge in the north. The WCS showed that Great Chesterford WRC serve 1,500 dwellings on one site and 508 sqm of employment, as well as 4,000 additional employees from the Greater Cambridge area. The capacity assessment for Great Chesterford WRC highlighted that the WRC's

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<sup>8</sup> [Local Plan timetable | North Herts Council](#)

<sup>99</sup> [Evidence base | North Herts Council](#)

<sup>10</sup> [Huntingdonshire Integrated Water Management Strategy: Stage 2 Water Cycle Study: Interim Report](#)

<sup>11</sup> [Stage 2 Water Cycle Study July 2024.pdf](#)



permit is likely to be close or to exceed a permit during the Local Plan period and that upgrades and/or a change to the permit limit may be required.

The WCS also noted that, in relation to the Phosphate permit, the proposed development that would be served by Great Chesterford could be accommodated with a tighter permit and upgrade to treatment, which would be achievable with the current technology.

### **3. Comment reference EA3: Permit re-assessment**

*Section 4.11.1 – ‘The statements in this paragraph are not correct. The Environment Agency does not reassess a WWTWs DWF where we anticipate that it will increase above the permitted value. It is Anglian Water’s responsibility to plan to remain in compliance. Where Anglian Water anticipate they will exceed their permitted DWF, then they must apply for an increase. We would then re-evaluate the associated numerical limits, Flow to Full Treatment setting, and Storm Storage Capacity (where applicable) as these are linked to DWF. A permit alteration may be undertaken as part of the Water Industry National Environment Programme (WINEP) where there is a relevant driver; these do not normally relate to altering the permitted DWF.’*

#### **Stantec’s response to comment reference EA3**

Paragraph 4.11.1 to be deleted and replaced by: ‘It is inevitable that new development will result in an increase in wastewater created and a resulting increase in treated effluent discharges. Where the DWF is anticipated to increase above the permitted value, AW should remain in compliance. Where AW anticipate they will exceed their permitted DWF, then they must apply for an increase. The EA would then re-evaluate the associated numerical limits, Flow to Full Treatment setting, and Storm Storage capacity (where applicable), as these are linked to DWF. A permit alteration may be undertaken as part of the Water Industry National Environment Programme (WINEP) where there is a relevant driver; however, these do not normally relate to altering the permitted DWF.’

### **4. Comment reference EA4: TAL for Suspended Solids**

*Section 4.11.4 TAL – ‘There is no TAL for Suspended Solids. This number is site specific (usually between 10-20mg/l) and generally related to the biochemical oxygen demand (BOD).’*

#### **Stantec’s response to comment reference EA4**

The following amendments in the Greater Cambridge Detailed WCS should be made:

- Paragraph 4.11.4: The reference of 10 mg/l as the TAL for Suspended Solids (first bullet point) should be removed.



- Paragraph 4.11.9: The reference to the revised permit for Uttons Drove WRC, calculated as 3.83 mg/l, should be removed.
- Paragraph 4.11.11: The reference to the revised permit for Uttons Drove WRC, calculated as 6.55 mg/l, should be removed.
- Table 4.15: The value of 3.83mg/l in the third column should be in black font.
- Table 4.16: The value of 6.55 mg/l in the third column should be in black font.

## **5. Comment reference EA5: Cambridge WRC TAL limit stretch target**

Section 4.11.13 Cambridge WWTW stretch target – *‘The statement around the Environment Agency reviewing this limit given the withdrawal of funding is not correct. The stretch target is included in the AMP8 WINEP obligation for this site. If Anglian Water want to change or remove this target, then they will need to apply for an alteration to the WINEP which we would review in conjunction with Department for Environment Food and Rural Affairs (DEFRA). We have had no such communication from Anglian Water’.*

### **Stantec’s response to comment refence EA5**

The EA has informed us on 20/08/2025 that the Phosphate TAL limit would be 0.4 mg/l with a stretch target to 0.25 mg/l. It was noted that the stretch target will be a trial to see if the site can reach that limit by optimising existing site processes. The EA also noted that this now may need to be reviewed following the withdrawal of the funding for the Cambridge WRC relocation.

## **6. Comment reference EA6: Wastewater Infrastructure upgrades and AW liaison**

Section 4.12 Wastewater Infrastructure Upgrades – *‘We are pleased that Anglian Water’s Drainage and Wastewater Management Plan (DWMP), published in 2023, has been consulted. However, given that this document was produced prior to the change in Government growth priorities for the region, the risk assessments and strategy proposals within that DWMP may no longer be correct. We do note that section 4.14.8. of the WCS mentions the new, emerging DWMP and we encourage GCSP to continue to work with Anglian Water as discussed. Following the publication of the next iteration of the DWMP (due 2028) it will be appropriate to review and update the WCS where necessary’.*

### **Stantec’s response to comment reference EA6**

GCSP will continue liaising with AW to assess any intermediate results that can be shared from the production of the emerging DWMP, due to be published in 2028.



## 7. Comment reference EA7: Effluent re-use

Section 4.13.5 and 4.14.16 effluent re-use – *‘Whilst there is merit in exploring the possibility of treated effluent for other purposes, there are currently regulatory mechanisms that must be complied with, including under waste legislation. This may pose additional costs that would need to be considered and their impacts on developers and/or end users’.*

### Stantec’s response on comment reference EA7

Paragraphs 4.13.5 and 4.14.16 do highlight that effluent re-use would require further assessment to ensure that public health is not impacted.

Paragraph 4.13.5 notes that *‘...Treated effluent could be used for potable supplies, subject to quality standards and infrastructure’.*

Paragraph 4.14.16 notes that *‘..However, re-use of effluent would require assessment to ensure that watercourses currently receiving treated flow are not detrimentally impacted by reduced river flows below sustainable levels, and public health is not impacted’.*

After paragraph 4.14.16 the following should be added: *‘Effluent re-use is subject to regulatory mechanisms that must be complied with, including those under waste legislation. This may pose additional costs that would need to be considered and their impacts on developers and/or end users.’*

## 8. Comment reference EA8: Load standstill summary

Section 4.14.4 Load standstill summary –*‘This paragraph states that the majority of the new revised determinants’ permits are above the relevant TAL, with some exceptions. Table’s 4.15 and 4.16 appears to show that 17 or 18 sites (depending on development scenario) will require below TAL limits for Phosphorous when growth is applied. There may be implications for growth in locations where WWTWs are not able to meet tighter standards.*

*We also note Huntingdon WWTW appears in Table 4.16, is this an error?’*

### Stantec’s response on comment reference EA8

Paragraph 4.14.4 notes that *‘The majority of the new revised determinands’ permits are above the relevant Technical Achievable Limit (TAL)..’.* This sentence refers to Suspended Solids, BOD, Ammoniacal Nitrogen and Total Phosphorous resulting permit values, not just Total Phosphorous.

Huntington WRC in Table 4.16 is an error, and it can be removed.



## 9. Comment reference EA9: TAL limits

EA13: Section 4.14.19 TAL and WINEP – *‘The TAL being applied to the WWTWs in AMP8 is to drive improvements in those waterbodies to try and achieve Moderate or Good WFD Phosphate (P) status. Should those same WWTWs need to increase their DWF, then we will review the permitted P limit with the likely outcome that it will need to be further tightened to maintain the aim of the AMP8 driver. Not all WWTW sites will be able to accommodate a below TAL limit and this may have implications for growth in those catchment’.*

### Stantec’s response on comment reference EA9

Paragraph 4.14.19 to be re-written as: *‘As noted above, the majority of the calculated “load standstill” values are above the relevant Technical Achievable Limits and, therefore likely feasible through conventional wastewater treatment enhancements, apart from a few exceptions outlined in Chapter 4. As noted in the ‘Headline findings of baseline conditions’ above, as part of WINEP, AW and the EA have agreed new limits for Total Phosphorus for a number of the WRCs in the Greater Cambridge area. The TAL being applied to the WRCs in AMP8 is to drive improvements in those waterbodies to try and achieve Moderate or Good WFD Phosphate (P) status. Should those same WRCs need to increase their DWF, then the EA will review the permitted P limit with the likely outcome that it will need to be further tightened to maintain the aim of the AMP8 driver.*

*The majority of the WRCs will have a P TAL limit of 0.25mg/l applied in AMP8, which will require AW to invest and introduce new technologies or management practices at these sites to comply with the permit.*

*It should be noted that not all WRCs will be able to accommodate a below TAL limit and this may have implications for growth in those catchments.’*

## 10. Comment reference EA10: WINEP summary

Section 5.3.19 WINEP Summary – *‘It appears that not all obligations for sites have been listed. For completeness, we suggest this section is updated to include all obligations’.*

### Stantec’s response on comment reference EA10

- **Arrington WRC discharging to River Rhee (DS Wendy)**
  - U\_MON3a<sup>12</sup> - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - PR24 U\_MON4 from U\_INV2 investigation (U\_MON4c)

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<sup>12</sup> U\_MON3a -



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- Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
- P removal technology at Arrington STW P limit 1.5
- **Balsham WRC discharging to Bottisham Lode - Quy Water**
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - PR24 U\_MON4 from U\_INV2 investigation (U\_MON4c)
  - Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact.
- **Barley WRC discharging to Cam Rhee and Granta**
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - PR24 U\_MON4 from U\_INV2 investigation (U\_MON4c)
  - Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
- **Bassingbourn WRC discharging to Mill River**
  - P removal technology at BASSINGBOURN STW to contribute to achieving improved WFDR stauts for the Mill River. P limit required:0.25mg/l
- **Bourn WRC discharging to Bourn Brook**
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - Move AMP7 U\_INV2 driver output to 2-minute flow monitoring (U\_MON4b)
  - Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
- **Brinkley WRC**

No WINEP obligations were identified
- **Cambridge WRC discharging to River Cam**
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor



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- PR24 U\_MON4 from U\_INV2 investigation (U\_MON4c)
- P removal technology at CAMBRIDGE STW to contribute to achieving improved WFDR stauts for the Cam. P limit required:0.4mg/l
- Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
  
- ***Shudy Camps (Camps) WRC discharging to River Granta***  
No WINEP obligations were identified
  
- ***Coton WRC discharging to Bin Brook***  
No WINEP obligations were identified
  
- ***Duxford WRC discharging to Hoffer Brook***
  - P removal technology at DUXFORD STW to contribute to achieving improved WFDR stauts for the Hoffer Brook. P limit required:0.25mg/l
  
- ***Elmdon WRC discharging to River Cam***  
No WINEP obligations were identified
  
- ***Foxton (Cambs) WRC discharging to River Rhee (DS Wendy)***
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - Move AMP7 U\_INV2 driver output to 2-minute flow monitoring (U\_MON4b)
  - P removal technology at FOXTON STW (CAMBS) to contribute to achieving improved WFDR stauts for the Rhee (DS Wendy). P limit required:0.25mg/l
  
- ***Gamilingay WRC***  
No WINEP obligations were identified
  
- ***Great Chesterford WRC discharging to River Cam (Audley End to Stapleford)***
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - Move AMP7 U\_MON4 driver output to 2-minute flow monitoring (U\_MON4a)



- P removal technology at GREAT CHESTERFORD STW to contribute to achieving improved WFDR stauts for the Cam (Audley End to Stapleford). P limit required:0.25mg/l
- ***Guilden Morden WRC discharging to River Rhee (US Wendy)***
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - Move AMP7 U\_MON4 driver output to 2-minute flow monitoring (U\_MON4a)
  - P removal technology at GUILDEN MORDEN STW to contribute to achieving improved WFDR stauts for the Rhee (US Wendy). P limit required:0.25mg/l
  - Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
- ***Haslingfield WRC discharging to Rhee (DS Wendy)***
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - Move AMP7 U\_MON4 driver output to 2-minute flow monitoring (U\_MON4a)
  - P removal technology at HASLINGFIELD-STW to contribute to achieving improved WFDR stauts for the Rhee (DS Wendy). P limit required:0.6mg/l
  - Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
- ***Hatley St George WRC discharging to Millbridge and Potton Brooks***
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - PR24 U\_MON4 from U\_INV2 investigation (U\_MON4c)
  - Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
- ***Linton WRC discharging to River Granta***
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor



- PR24 U\_MON4 from U\_INV2 investigation (U\_MON4c)
- P removal technology at LINTON STW to contribute to achieving improved WFDR stauts for the Granta. P limit required:0.25mg/l
- Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
- ***Litlington WRC***

No WINEP obligations were identified
- ***Melbourn WRC discharging to River Shep***
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - PR24 U\_MON4 from U\_INV2 investigation (U\_MON4c)
  - P removal technology at MELBOURN STW to contribute to achieving improved WFDR stauts for the Shep. P limit required:0.25mg/l
- ***Over WRC discharging to Old West River***
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - Move AMP7 U\_MON4 driver output to 2-minute flow monitoring (U\_MON4a)
  - P removal technology to achieve Environment Act nutrient reduction objective
  - Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
  - No adverse ecological impact from storm overflows at 148 shellfish or RNAG sites
- ***Papworth Everard WRC discharging to West Brook***
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - Move AMP7 U\_MON4 driver output to 2-minute flow monitoring (U\_MON4a)
  - P removal technology at PAPWORTH EVERARD STW to contribute to achieving phosphorous favourable condition target in the Ouse Washes. P limit required:0.25mg/l



- Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
- **Royston WRC discharging to Whaddon Brook**
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - PR24 U\_MON4 from U\_INV2 investigation (U\_MON4c)
  - P removal technology at ROYSTON STW to contribute to achieving improved WFDR stauts for the Mel. P limit required:0.25mg/l
  - Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
- **Sawston WRC discharging to River Cam (Audley End to Stapleford)**
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - Move AMP7 U\_MON4 driver output to 2-minute flow monitoring (U\_MON4a)
  - P removal technology at SAWSTON STW to contribute to achieving improved WFDR stauts for the Granta. P limit required:0.4mg/l
  - Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)
- **Tadlow WRC**

No WINEP obligations were identified
- **Teversham WRC discharging to Bottisham Lode – Quay Water**
  - U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
  - Move AMP7 U\_INV2 driver output to 2-minute flow monitoring (U\_MON4b)
  - P removal technology to achieve Environment Act nutrient reduction objective
  - Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)



- ***Thurlow WRC discharging to River Stour***

No WINEP obligations were identified

- ***Uttons Drove (Bar Hill) WRC discharging to Swavesey Drain***

- U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
- Move AMP7 U\_MON4 driver output to 2-minute flow monitoring (U\_MON4a)
- P removal technology at UTTONS DROVE STW to contribute to achieving improved WFDR stauts for the Swavesey Drain. P limit required:0.3mg/l
- Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)

- ***Waresley WRC discharging to Abbotsley and Hen Brooks***

- U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
- Move AMP7 U\_MON4 driver output to 2-minute flow monitoring (U\_MON4a)
- Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)

- ***Waterbeach WRC discharging to River Cam***

- U\_MON3a - MCERTS certification of an AMP7 U\_MON3 driver output overflow operation monitor
- Move AMP7 U\_MON4 driver output to 2-minute flow monitoring (U\_MON4a)
- P removal technology to achieve Enviornment Act nutrient reduction objective
- Investigations to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact. At WRC sites (462 in total)

- ***West Wickham WRC***

No WINEP obligations were identified



## **11. Comment reference EA11**

Section 5.8.1 Development improving water quality – *‘We consider that the statement in this paragraph provides an overly optimistic view of the impact of development on river water quality. Whilst development can be an investment driver to upgrade WWTW, it will not be the case in all situations. The reference to the proposed new Cambridge WWTW and ‘ultra-low’ phosphorous permit is dubious given there is no definition of what ‘ultra-low’ means, and investment at this WWTW may still not be sufficient to achieve phosphorous limits that would improve downstream water quality due to infeasible costs and/or technological constraints. We are unclear as to why the reference to the proposed new WWTW has been left in this section, given it is stated on Page 2 that the funding for the relocation has been withdrawn’.*

### **Stantec’s response on comment reference EA11**

Paragraph 5.81 to be deleted and replaced by: *‘Development can improve water quality for some WRCs by being an investment driver for the latest wastewater treatment improvements or entire new treatment facilities.’*

