



Homes
England

Date: 3 August 2022

Our Ref: RFI3913

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

Making homes happen

By Email Only

Information Governance Team
Homes England
Windsor House – 6th Floor
50 Victoria Street
London
SW1H 0TL

Dear [REDACTED]

RE: Request for Information – RFI3913

Thank you for your request for information which was processed in accordance with the Freedom of Information Act 2000 (FOIA) and the Environmental Information regulations 2004 (EIR).

You requested the following information:

In accordance with section 16 of the Freedom of Information Act and the corresponding duty to provide advice and assistance, please supply the following information:

a) copies of the information provided by the applicant relating to the notional locations described in the initial RFI3886 response, including applicable meeting minutes and correspondence.

b) confirmation if the applicant informed Homes England that for the level of funding requested the proposed relocation would have to be to a green belt site.

For clarity, your request was following our response to a previous request for information, referenced RFI3886, available on our disclosure log here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1089056/RFI3886 - Cambridge Waste Water Relocation HIF.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1089056/RFI3886_-_Cambridge_Waste_Water_Relocation_HIF.pdf).

This request relates to the Cambridge Northern Fringe East (CNFE) proposed site for relocation of the Cambridge Waste Water Treatment Plant (CWWTP). Homes England is involved in providing funding to Cambridge City Council via the Housing Infrastructure Fund.

Applicable Regime

On 5 July 2022, we wrote to advise you that the deadline for Homes England to issue response had been extended by 20 working days. At this point we had not been able to conclude whether the FOIA or the EIR were more applicable to the information held. Your request was originally considered under the Freedom of Information Act 2000 (FOIA) and it has been determined that the exemption in Section 39 of the FOIA applies. Section 39 FOIA provides that Information is exempt information if the public authority holding it:

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- (a) is obliged by environmental information regulations to make the information available to the public in accordance with the regulations, or
- (b) would be so obliged but for any exemption contained in the regulations.

Environmental information is defined in Regulation 2(1) of the Environmental Information Regulations 2004 (EIR). This provides that environmental information is:

"any information in written, visual, aural, electronic or any other material form on:

- (a) the state of the elements of the environment, such as air and atmosphere, water, soil, land, landscape and natural sites including wetlands, coastal and marine areas, biological diversity and its components, including genetically modified organisms, and the interaction among these elements;*
- (b) factors, such as substances, energy, noise, radiation or waste, including radioactive waste, emissions, discharges and other releases into the environment, affecting or likely to affect the elements of the environment referred to in (a);*
- (c) measures (including administrative measures), such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affect the elements and factors referred to in (a) and (b) as well as measures or activities designed to protect those elements;...."¹*

The ICO guidance advises that public authorities should interpret 'any information on' broadly. Information that would inform the public about matters affecting the environment or enable them to participate in decision making, and help to achieve that purpose is likely to be environmental information, even if the information itself does not directly mention the environment.

It further advises that the test that public authorities should apply is whether the information is on or about something falling within the definitions in regulations 2(1)(a)-(f), and not whether the information directly mentions the environment or any environmental matter.

We have determined, based upon this guidance, that the information that you have requested is environmental information and therefore that the exemption is 539 FOIA does apply to it.

The exemption in Section 39 FOIA is a qualified exemption which means that we must apply the Public Interest Test to it. Having considered the ICO guidance, which provides, "... *given the fact that authorities have an obligation to respond to requests for environmental information under the EIR it is hard to envisage any circumstances where it would be in the public interest for the authority to also consider that information under FOIA*" we have therefore determined that it is not in the public interest to consider it under FOIA and rather that we should process the request in accordance with the EIR.

Response

We can inform you that we do hold some information in scope of your request. However, some information is not held by Homes England and therefore we have addressed your questions individually for clarity.

¹ Note there are further paragraphs (d) to (f) which are not set out here.



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a) *copies of the information provided by the applicant relating to the notional locations described in the initial RFI3886 response, including applicable meeting minutes and correspondence.*

We can confirm that the applicant provided information in this scope to Homes England, which is attached as Annex A.

This information reflected the position at the time it was submitted to Homes England in September 2019 and aligned with the applicant's understanding of site selection at that point in time. However, it is important to note that the position developed further to identify a final preferred site (between Horningsea and Fen Ditton) which is different from that identified in the conclusion slides 17 & 18.

Advice and Assistance

Regulation 9(1) provides that an authority must provide advice and assistance to applicants and in accordance with this we can advise that the complete and fully transparent site selection is publicly available within the project website under 'Site Announcement' documentation and was published in January 2021. The link to this information is as follows: <https://cwwtpr.com/wp-content/uploads/2021/01/CWWTPR-Site-Announcement-Report-2.pdf>.

The information found on the link above therefore supersedes the information provided in Annex A.

b) *confirmation if the applicant informed Homes England that for the level of funding requested the proposed relocation would have to be to a green belt site.*

Regulation 12(4)(a) – Information not Held

Under regulation 12(4)(a) of the EIR, Homes England may refuse to disclose information if the requested information is not held by that public authority.

When relying on Regulation 12(4)(a), Homes England must also advise details of any other public authority to whom the requestor could redirect their request to, and in accordance with this we can advise that you may wish to contact Cambridge City Council.

Advice and Assistance

Regulation 9(1) provides that an authority must provide advice and assistance to applicants and in accordance with this we can advise that the applicant did not inform Homes England that for the level of funding requested the proposed relocation would have to be to a green belt site.

Right to Appeal

If you are not happy with the information that has been provided or the way in which your request has been handled, you may request an internal review. You can request an internal review by writing to Homes England via the details below, quoting the reference number at the top of this letter.

Email: infogov@homesengland.gov.uk

The Information Governance Team
Homes England – 6th Floor



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Your request for review must be made in writing, explain why you wish to appeal, and be received within 40 working days of the date of this response. Failure to meet this criteria may lead to your request being refused.

Upon receipt, your request for review will be passed to an independent party not involved in your original request. We aim to issue a response within 20 working days.

You may also complain to the Information Commissioner's Office (ICO) however, the Information Commissioner does usually expect the internal review procedure to be exhausted in the first instance.

The Information Commissioner's details can be found via the following link:

<https://ico.org.uk/>

Please note that the contents of your request and this response are also subject to the Freedom of Information Act 2000. Homes England may be required to disclose your request and our response accordingly.

Yours sincerely,

The Information Governance Team
For Homes England

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Cambridge Waste Water Treatment Plant Relocation Project



Meeting with Homes England

17 September 2019

Confidential Information- not for further dissemination



Agenda



- The Relocation Project
- History & function
- Site Selection Process
 - Stage 1: Initial Site Selection
 - Stage 2: Coarse Screening
 - Stage 3: Fine Screening
- Carbon Assessment
- Tunnelling illustration
- Conclusions
- Pre-Application Process

The Cambridge Waste Water Treatment Plant Relocation Project ('CWWTP')

- The key aim of the project:

CWWTPRP will allow Anglian Water to continue to provide critical water recycling services to residents in and around Cambridge in a new, low-carbon facility designed in collaboration with stakeholders and the community.

- Announcement in March that £227m grant from the Housing Infrastructure Fund (HIF) will be allocated to unlock one of the last remaining brownfield sites for regeneration in Cambridge, currently occupied by Anglian Water's Waste Water Treatment Plant (WWTP), to facilitate the planned regeneration of the Cambridge Northern Fringe.
- Anglian Water are seeking to apply for a Development Consent Order (DCO) for the relocation of its existing waste water treatment plant from its site in Cambridge to a new location making the way for in excess of 5600 new homes.
- Since the funding announcement, we have been working in partnership with host Local Authorities to scope the programme to deliver the relocation.
- We have also begun the process of a detailed assessment of site area and options and are inviting our local authority partners to play a key role in inputting to that assessment before any public engagement is commenced.

The Cambridge Waste Water Treatment Plant – history and function

- **1895** - The Milton site was built to 'treat' the sewage from Cambridge. Sewage was pumped from the old pumping station (now the Museum of Technology) in the centre of the city to the newly established site where it was spread across the land.
- Across our region Anglian Water receives used water in over 1,000 sites from 6million customers' homes, cleans it and returns it to the environment.
- Cambridge is one of our largest WWTP's serving the whole city and the surrounding area via the existing sewerage network and receiving sludge from surrounding satellite sites.
- On average the site treats an enormous 1,300 litres of used water a second, that equates to over 9million toilet flushes a day.
- The first part of the treatment process involves all the used water being pumped into the treatment site.
- The second part is the screening process removing all unflushables and then grit from the used water.
- The remaining water is then diverted to five primary settlement tanks. These tanks allow solids in the water to settle to the bottom of the tank where a spreader pushes them into the middle and they are sucked away to be used as part of the sludge treatment process later on.
- The sewage is then pumped to the two activated sludge plants where dissolved oxygen is pumped into the tanks allowing bacteria to flourish and break down the sewage.
- Essentially this is removing the 'pollutant' part of the sewage or BOD and chemicals such as ammonia and phosphate. Some sludge is also removed at this point too and again is added to the sludge treatment process.
- The final stage in the cleaning process are the radial flow tanks, which allow any remaining solids to be filtered out.
- The treatment plant also deals with flows from a combined system i.e. high % of surface and storm flows.
- The high quality water is now ready to be returned to the River Cam.

The Cambridge Waste Water Treatment Plant – history and function cont.

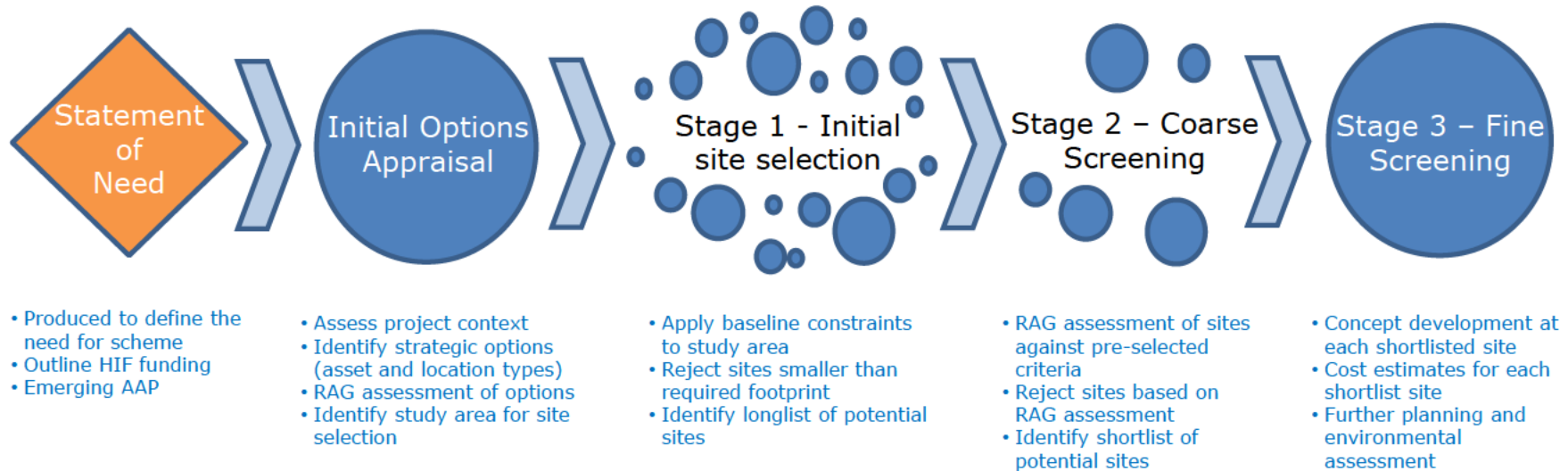
Sludge Treatment

- All solids removed during the water treatment process and received at the CWWTP then pass through the sludge treatment process , firstly to generate green energy, but also to produce a sustainable agricultural product.
- Our sludge digesters can hold up to 2700 tonnes of sludge at any one time. The sludge is heated to 38 degrees to roughly 10 days to two weeks, allowing natural bacteria (the same as that in our own guts) to flourish.
- This process releases methane which we can collect in a gas holder and use onsite to run our Combined Heat and Power (CHP) unit. This generates enough electricity to heat the sludge digesters and power 40% of the site.
- The left-over product is thickened and then used as a fertiliser by farmers for their crops as a material known as 'cake', and the residual wastewater, known as 'liquor' is returned to the start of the water treatment process.



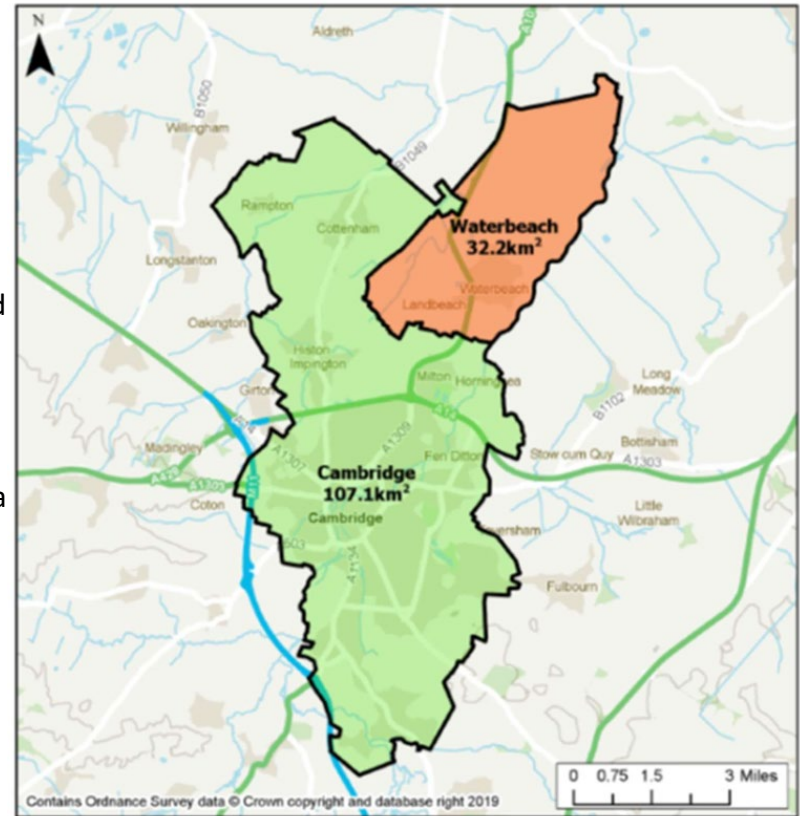
Source: Savills brochure for QFU procurement to appoint a Master Developer

Site Selection Process



Site Selection Process – Initial Options Appraisal

- The area is defined by:
 - Reference to the catchment area of the Cambridge WWTP;
 - *Water Framework Directive (“WFD”) 2008/98/EC*: Article 16 of the WFD: the Proximity Principle identifies the need to treat and dispose of waste in close proximity to its point of origin;
 - Cambridgeshire & Peterborough Minerals and Waste Core Strategy including principles of proximity to the area served; access to suitable watercourse; located outside areas liable to flood risk.

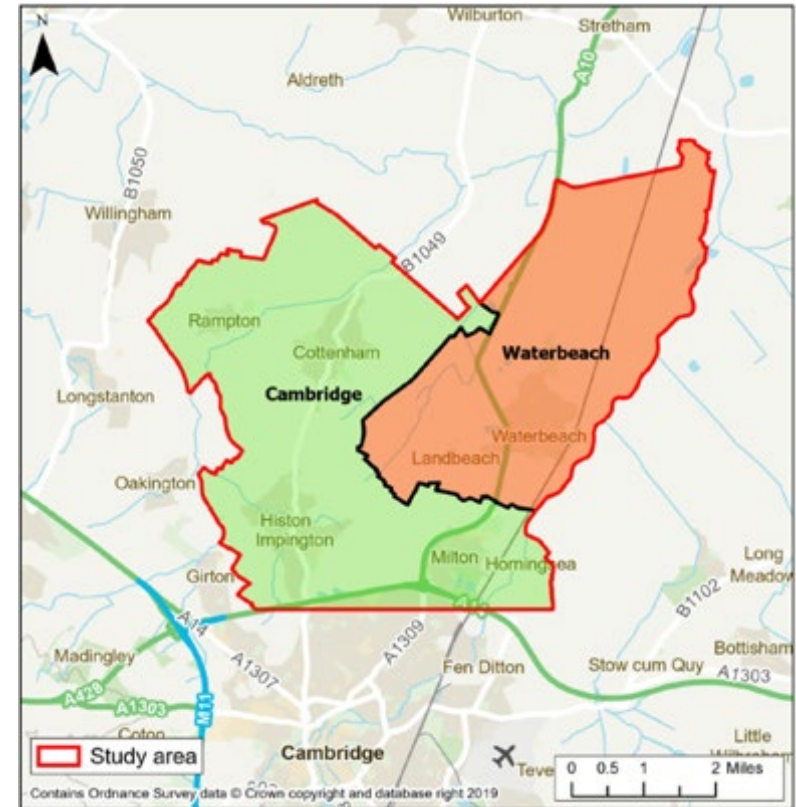


Site Selection Process – Study Area

- A single new WWTP, within a study area covering the existing Cambridge catchment, to the north of both the existing Cambridge WWTP site and current Cambridge urban boundary has been identified as the optimum study area
- Operational requirements including topographical constraints; energy efficiency/ sustainability; impact on local residents; flood zones; distance from discharge to river

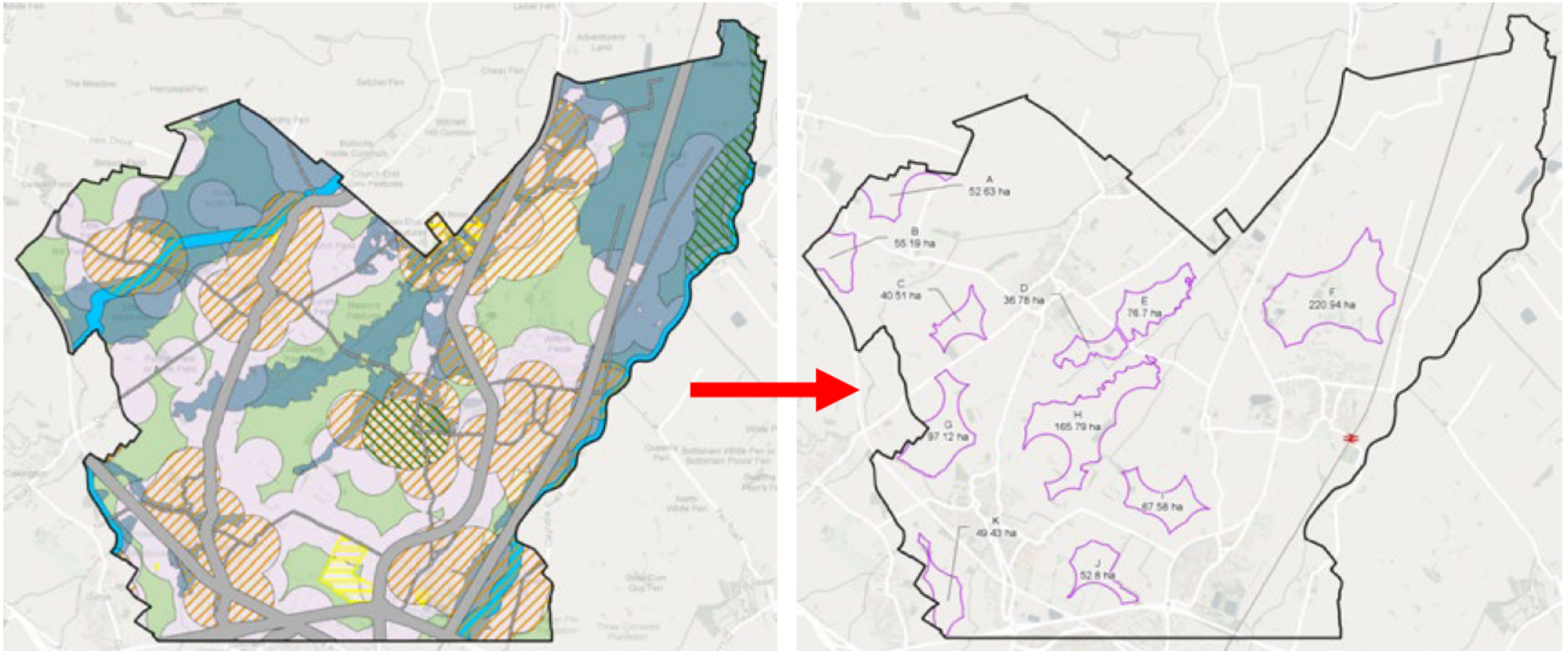
Particular benefits of the option are:

- Location (compliance with the proximity principle)
 - Continued discharge of treated effluent to the Cam at or close to the existing discharge point
 - Reduced need to modify the existing sewer network
 - Reduced traffic impacts during operation (e.g. Increased impact of HGV traffic in urban areas to the South).
 - Relatively lower carbon emissions and costs
- In practice, far less likely that suitable locations would be identified in the south part of the Cambridge catchment e.g. due to SSIs, heritage assets, greater urban density



The area also includes the possibility of incorporating the additional capacity required to serve existing Waterbeach village and new town

Stage 1 – Initial Site Selection



This shows the application of various criteria from the National Policy Statement (flood risk; 400 metre boundary from existing buildings; conservation areas; sites of special interest etc.) resulting in a long list of potential areas for site location within the study area

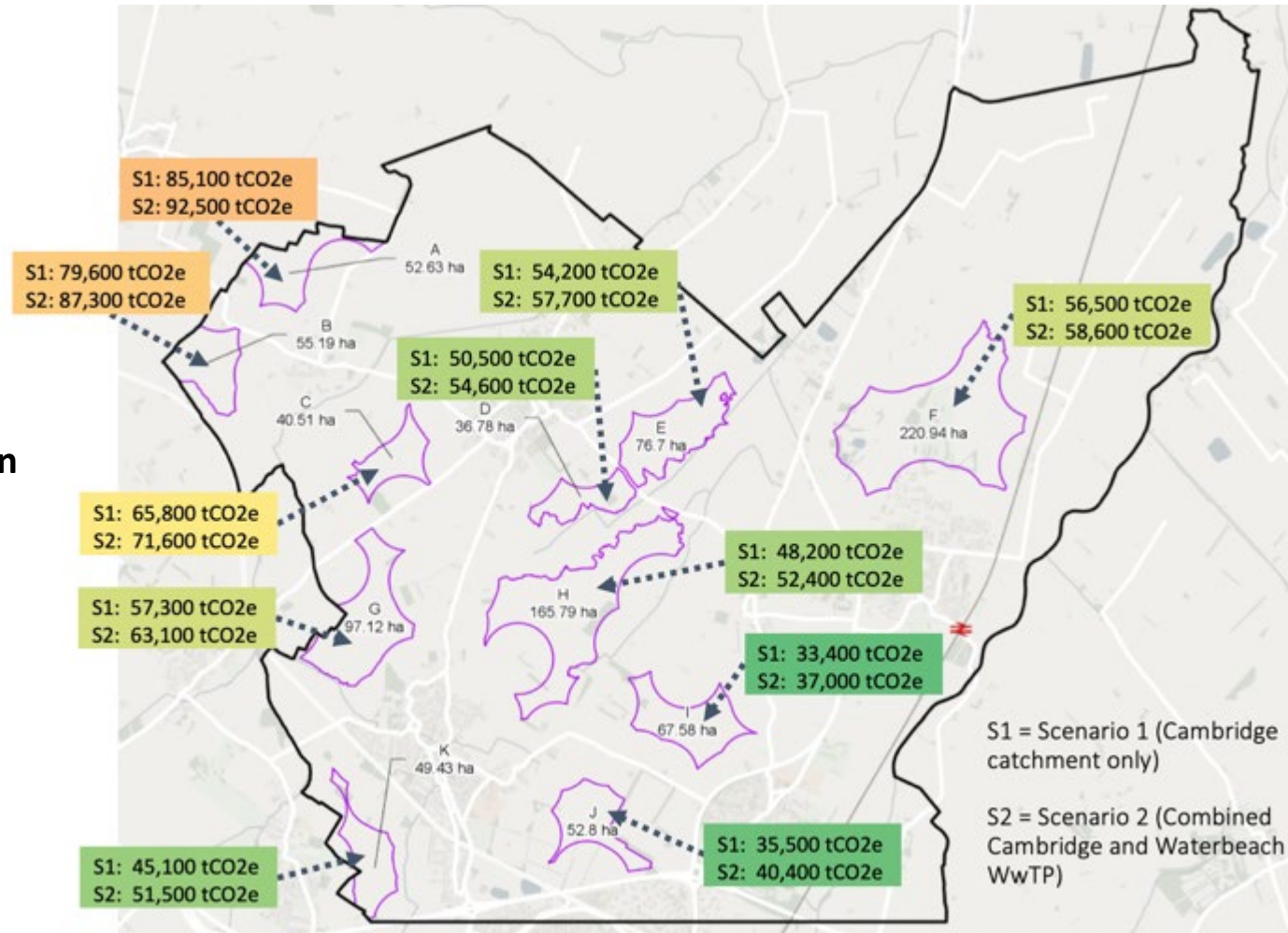
Stage 2 – Coarse Screening

Objectives of Stage 2:

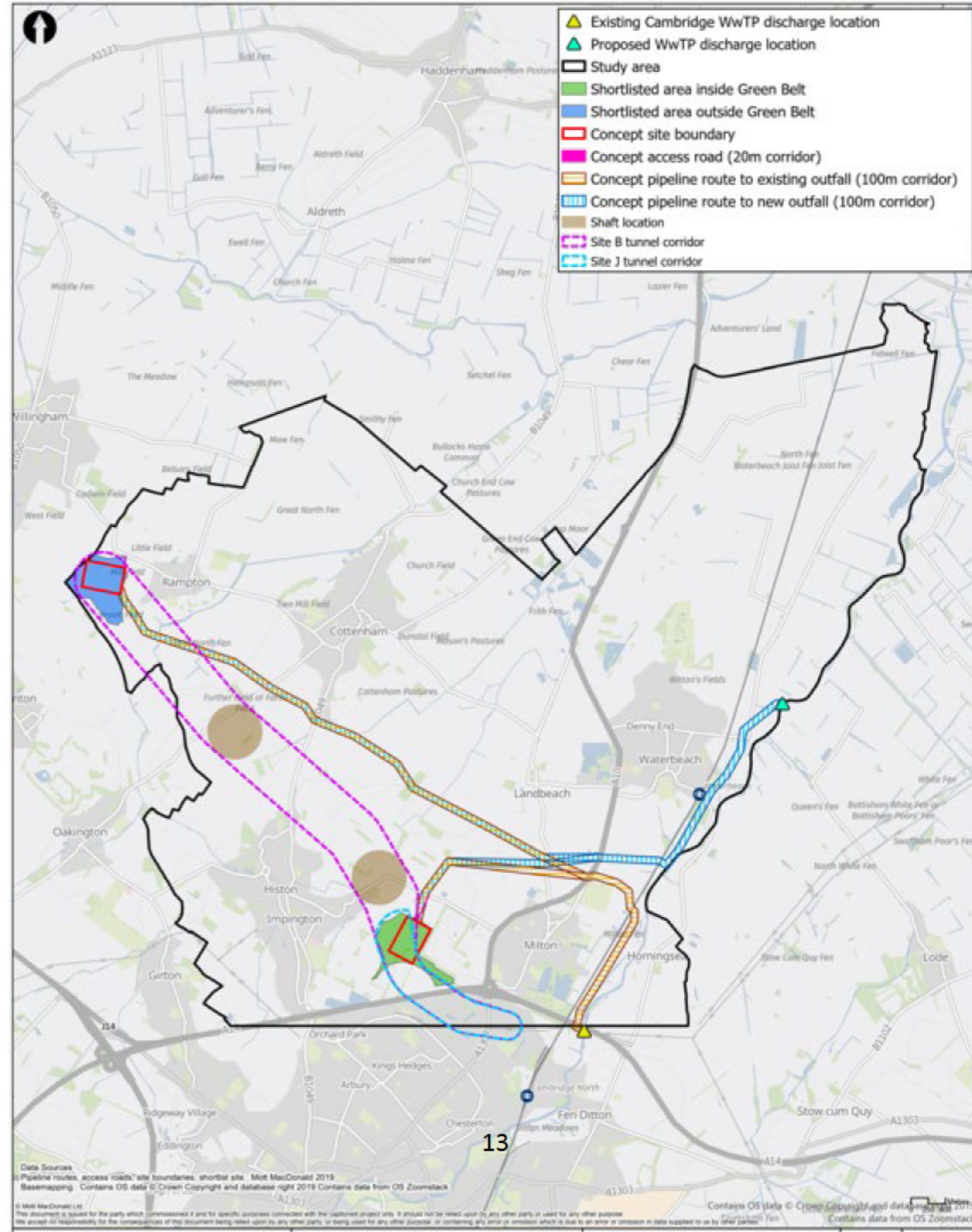
- Identify preferred sites based on their cumulative performance against a range of criteria agreed with Cambridgeshire County Council
- **Red**, **amber** and **green** (RAG) scoring. Key factors:
 - Carbon impact – construction and operational
 - Impact on local communities
 - Development constraints
 - Construction and operation access roads
 - Size and shape of land parcel
 - Wastewater transport infrastructure
 - Green Belt
 - Hydrogeology (Groundwater)
 - Hydrology (Surface water)
 - Contaminated land
 - Ecological risks
 - Locally designated heritage sites
 - Visual sensitivity
 - Viability

Carbon Assessment

60% less CO₂ at Site I in comparison to Site A

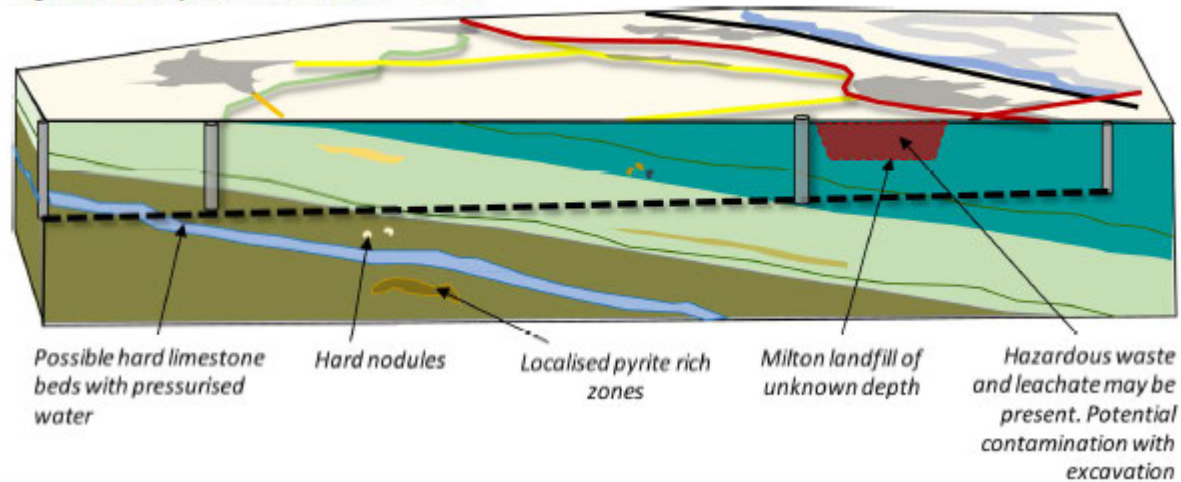


Stage 3 - tunnel corridor Site B



Stage 3 - tunnelling complexities & risks

Figure 3: Conceptual Ground Model – Line B



- Greensand – groundwater under pressure and would need to be controlled through additives during tunnelling and installation of secondary tunnel lining would be required.

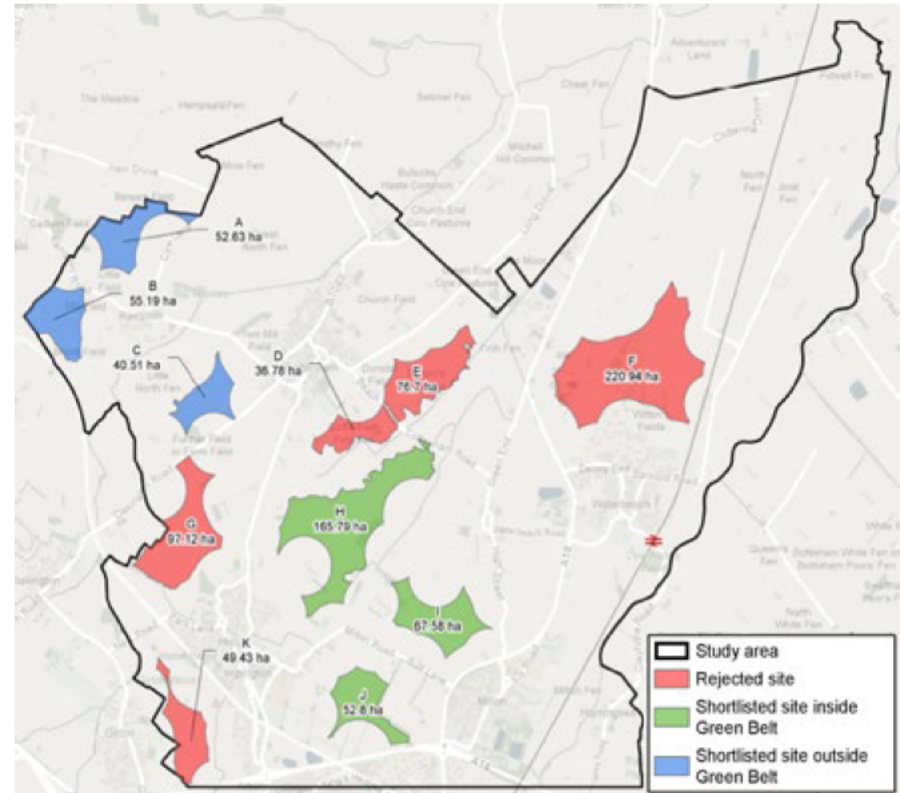
Stage 2 – Coarse Screening

Rejected sites:

- E: Moderate risk for tunnelling and site contains Cottenham Point to Point Racecourse
- F: Site encompasses Waterbeach New Town proposed development. Moderate risk for tunnelling and higher risk for contamination (former Waterbeach Airfield).
- G: Higher risk for tunnelling, increased carbon impact and in proximity to several Conservation Areas
- K: Higher risk for tunnelling, increased carbon impact and greater potential impact on the local community

Resulting shortlist of sites:

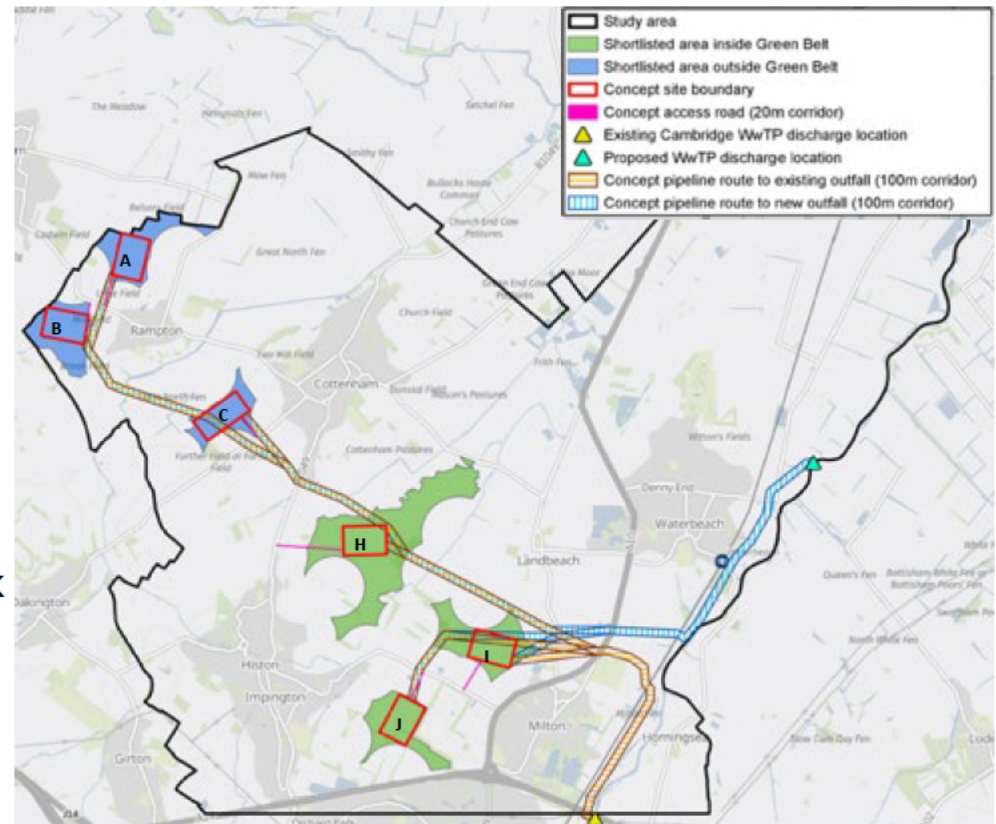
- have a higher risk for tunnelling and higher carbon impact (A, B and C)
- have a lower risk for tunnelling and lower carbon impact (H, I and J)



Stage 3 – Fine Screening

Objectives of Stage 3

- Development of a site concept for each of the shortlist of sites based on a reduced site area in comparison to the existing 40ha WWTP in Cambridge
- Identifying concept site access and carbon footprint of options
- Further planning and environmental assessment using RAG scoring, including specific desk studies for ecology, heritage, landscape, contaminated sites.



Conclusions

Overall Sites I and J perform better than all of other sites

- Owing to a lower carbon impact, proximity of sites to the strategic road network and reduced impact to communities.

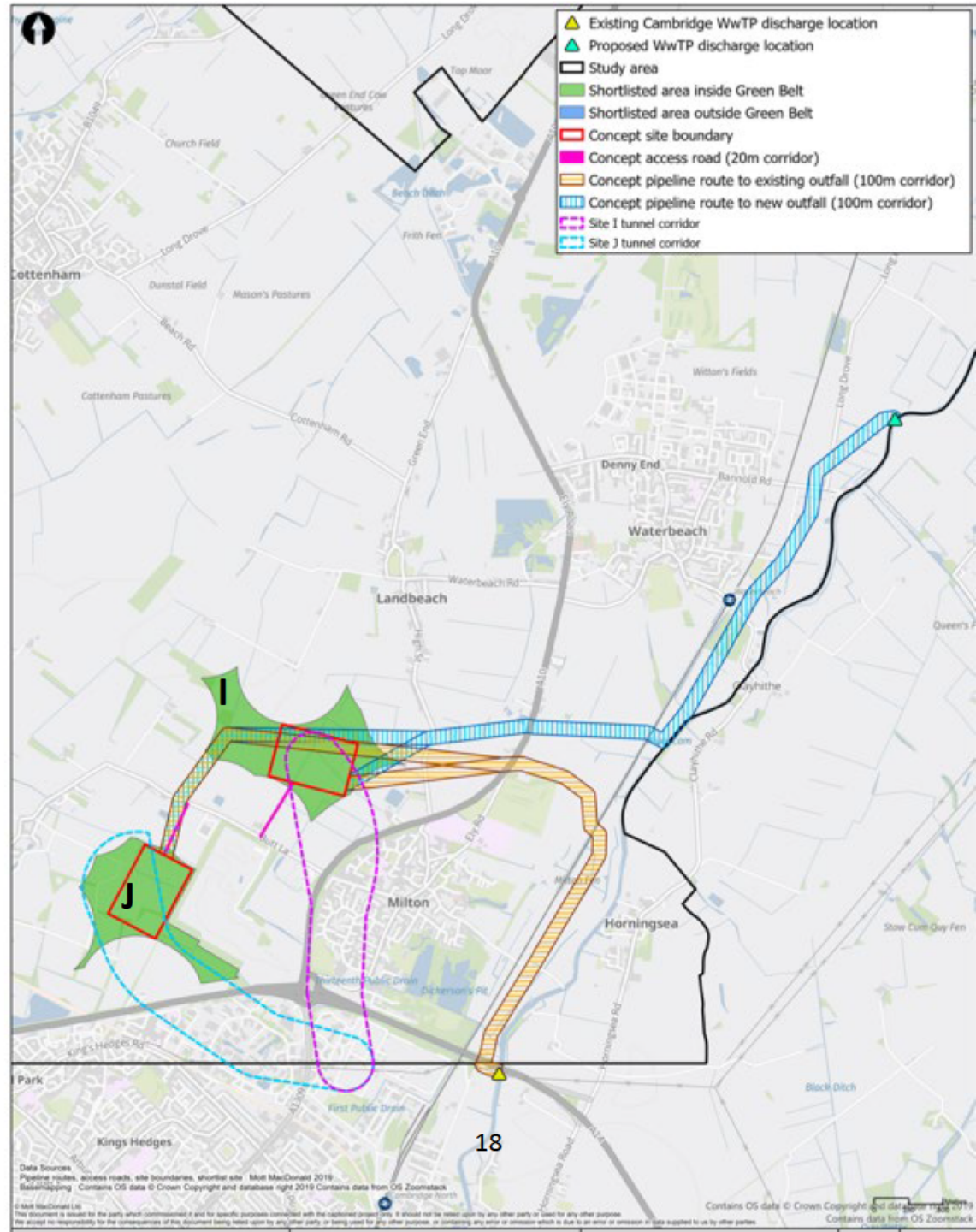
Potential impacts on local communities

- Access routes for A, B, C and H:
 - Pass through the centre of at least one village and pass other sensitive receptors, such as schools and nurseries.
 - Include other potential safety concerns such as pedestrian and cycle crossings (A, B and C) and Cycle Lanes (H).
 - Routes to sites A, B and C are not particularly suitable for HGVs, due to the geometry of the roads and the notable pinch points.
- With the exception of Site J all of the sites are considered to have a moderate landscape and visual sensitivity.

Other considerations

- The waste water infrastructure (tunnels) to the other sites A, B, C and H have much longer lengths and present groundwater impacts.
- The combination of the longer lengths of tunnel and length of return pipelines for A, B, C and H have a considerable impact on the carbon footprint and cost of the options when compared with those for Sites I and J. Reducing our carbon footprint and costs are two key commitments to our customers.
- It is acknowledged that sites I and J are in the Greenbelt.

Stage 3 Conclusions - Sites I and J



Next Steps

Pre-Application Consultation Process

Our overriding aim will be to maintain open and transparent communications and conduct a meaningful and two way dialogue on our plans with stakeholders and the community.

Early Engagement

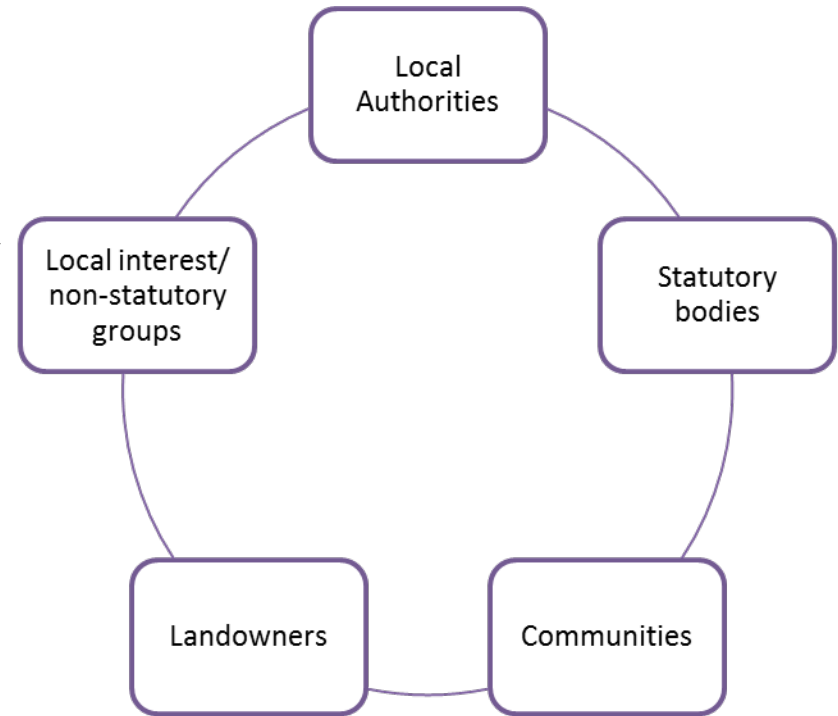
- We will be engaging early with the Council Leadership across the authorities followed by briefing meetings with members and presentations to the relevant wards and parishes
- We will seek ongoing engagement with these groups and the MPs
- Will identify sensitive stakeholders to engage with early on

Statement of Community Consultation (SoCC)

- In accordance with the Planning Act 2008, we will be consulting with the host authorities on our plans to engage with communities by way of a draft SoCC to develop the best plan to consult with their communities

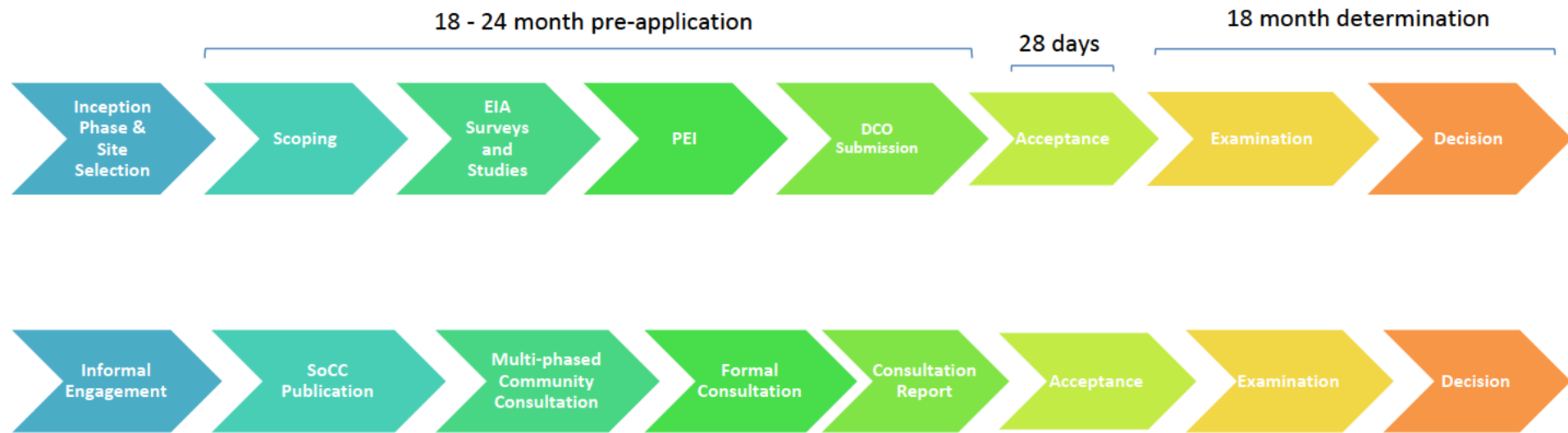
Multi-Stage Consultation

- We would like to begin speaking with local people at an early stage of our project. We will seek feedback on our proposals and methods, and will take on board local knowledge to refine our approach wherever possible through multiple rounds of consultation.



Pre-Application Process

- Indicative timeframes for parallel DCO and Consultation Process



Any questions?

