



Homes  
England

Making homes happen

Date: 27 September 2022

Our Ref: RFI3919

Tel: 0300 1234 500

Email: [infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)

By Email Only

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

Dear [REDACTED]

**RE: Request for Information – RFI3919**

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:

*Under the Freedom of Information Act please provide all correspondence between Homes England and Cambridge City Council leading to award of the £227m Forward Funding Agreement for Northern Fringe East Cambridge.*

*It is expected that all correspondence will have taken place with Cambridge City Council, as the nominated contact in the bid document. However, please also include relevant correspondence between Homes England and other interested parties, should it have taken place, such as the highest local authority, The Cambridge and Peterborough Combined Authority, or Anglian Water Services Limited.*

**Applicable Regime and timescale for response**

On 7 July 2022, we wrote to advise you that the deadline for Homes England to issue response had been extended by 20 working days under FOIA in order for us to balance the public interest in release of the information held (the public interest test). We then wrote again on 4 August to extend this deadline further, in order to conclude this balancing exercise. As you know, we were unable to conclude this within the advised timescale and Homes England apologise for the further delay in providing this response to your request. We do aim to issue all responses under FOIA or EIR within the 20 working days as prescribed by the legislation, but occasionally this is not achieved. We apologise again for this impact on your request and can remind you of your right to refer our handling of the request to the Information Commissioner's Office (ICO).

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:

- (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.

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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;...."<sup>1</sup>*

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 in Section 39 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 information in scope of your request. Please find enclosed with this response Annex A. Information contained within Annex A has been redacted under Regulation 13 of the EIR:

### **Regulation 13 – Personal Data**

We have redacted information on the grounds that it constitutes third party personal data and therefore engages Regulation 13 of the EIR.

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



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To disclose personal data, such as names, contact details, and personal opinions could lead to the identification of third parties and would breach one or more of the data protection principles.

Regulation 13 is an absolute exception which means that we do not need to consider the public interest in disclosure. Once it is established that the information is personal data of a third party and release would breach one or more of the data protection principles, then the exception is engaged.

The full text in the legislation can be found on the following link;  
<http://www.legislation.gov.uk/ukxi/2004/3391/regulation/13/made>

Further information held by Homes England in scope of your request has been withheld from disclosure in its entirety in accordance with Regulation 12(5)(e) of the EIR:

**Regulation 12(5)(e) – Confidentiality of commercial or industrial information**

Under regulation 12(5)(e) of the EIR, Homes England may refuse to disclose information to the extent that its disclosure would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest.

Four elements are required for Regulation 12(5)(e) to be engaged:

- 1) The information is commercial or industrial in nature;  
The information contains financial and performance assessments that relate to an ongoing commercial operation regarding prospective/potential development that is ongoing/under negotiation. Therefore, it is commercial in nature as it relates to commercial activity.
- 2) Confidentiality is provided by law;  
The withheld information is subject to confidentiality provided by law under a common law duty of confidence. The information has a common law duty of confidence because it is not trivial and not in the public domain. The information was created by two parties who have entered into contractually binding confidential terms. These show that the parties had the intention that a duty of confidentiality would be created between them. Homes England therefore recognises that this information was intended to be held in confidence between the parties.
- 3) The confidentiality is providing a legitimate economic interest;  
The withheld information relates to a site that is subject to development proposals. If the confidentiality of this information was breached, it would harm the ability of Homes England and third parties to receive value for money for land and services at this site. There is a legitimate economic interest in protecting the ability of Homes England and third parties to negotiate in current and future commercial agreements.
- 4) The confidentiality would be adversely affected by disclosure;  
Disclosure would result in third parties gaining access to commercially valuable information. Disclosure of the confidential information would harm the ability of Homes England to achieve good value for public money.



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### Public Interest Test

Regulation 12(5)(e) is subject to the public interest test. Once the exception has been engaged it is then necessary to consider the balance of the public interest in maintaining the exception or disclosing the information.

Under regulation 12(2) the public authority must apply a presumption in favour of disclosure, in both engaging the exception and carrying out the public interest test. In relation to engaging the exception, this means that there must be clear evidence that disclosure would have the adverse effect listed in 12(5).

### Factors in favour of disclosure

- Homes England acknowledge that there is a presumption in disclosure regarding environmental information as well as a public interest in promoting transparency in how we undertake our work and allocate public money;
- Homes England acknowledges there is an interest in the arrangements relating to the funding it delivers particularly where these are large funding amounts that have the potential to impact a large amount of people;
- Homes England acknowledges that there is local interest in the proposed development that the funding will deliver and that there has been public engagement in consultations regarding delivery; and
- Homes England acknowledges the public interest arguments put forward individually by the requestor in correspondence regarding this request and confirms that these have been taken into consideration. Homes England also acknowledge that there have been several requests for information from members of the public regarding this site and this funding and therefore acknowledge that there is interest from the public in our involvement.

### Factors in favour of withholding

- The correspondence between Homes England and the Local Authority sets out appraisals and opinions in relation to ongoing milestones and targets; delivery and operational appraisals; performance criteria, and information relating to payments/repayments of funding in relation to this project. The information contained within the correspondence has gone on to be a part of or directly influence the contractual detail set out in the Grant Determination Agreement (GDA) for the funding.

To release the detail of these ongoing contractual obligations between the parties would be likely to prejudice their ability to fulfil the requirements agreed between the parties in the GDA. It is imperative that the Local Authority be able to work to achieve the obligations set out in the contract without undue influence from third parties that could disrupt the development, contracting process, or prejudice other funding sources that could put the overall scheme at risk. This would affect value for public money and prejudice new homes which would not be in line with the strategic objectives set out by government that Homes England is tasked with achieving as per our strategic plan.

- The correspondence sets out commercial delivery figures provided by the Local Authority which have gone on to influence milestones and funding amounts as set out in the GDA. To release the information to the public domain would be likely to result in the Local Authority facing undue pressure to meet these arrangements as a result of inappropriate commercial and public interventions. Failure to meet the agreed deadlines could result in a material breach of contract. This would have significant cost implications on both the Local Authority and Homes England. This would directly nullify public funds already spent and would be likely to inflate the cost of future spend on the site, which would not be in the public interest as it would directly affect the public purse.



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- The GDA contains confidentiality provisions in relation to the Local Authority's obligations and release of the information would breach these undertakings. This would be likely to cause significant detriment to Homes England in our relationship with a partner. As the government's housing accelerator Homes England has to support relationships with partners in order to achieve our strategic objectives and support home delivery with best value for public money. If partners felt that Homes England would reveal confidential commercial information in relation to projects where we are collaborating it would be likely that future partners would be unwilling to work with us or be wary of being open and transparent. This would cause significant risk in Homes England being able to invest public money and resources in the widest possible net of partners in order to achieve best value for money. It is imperative that Homes England are able to attract competitive partners and are respected in the market as a positive force.
- The requested information relates to a current and ongoing project where all opportunities/proposals have not yet been determined or concluded. If other potential or confirmed sources of funding became aware of the terms of the Forward Funding (under the Housing Infrastructure Fund (HIF)) and the obligations placed on the Local Authority regarding this funding as contained in the letter, it would be likely to prejudice the ability of the Local Authority to negotiate for and secure other sources of funding. This would result in Homes England having to pay a higher grant than would have otherwise be the case, meaning greater cost to the public purse which would not be in the public interest.
- Releasing the information would be likely to negatively impact future funding processes and proposals to our funding schemes as potential partners may be deterred from applying to Homes England for grant funding if they felt information relating to their commercial and ongoing funding commitments would then be released to the public domain. This would be likely to result in a substantial impact on potential financial outcomes and delivery of the HIF. Furthermore, this would impact the ability of Government officials to make effective, informed decisions regarding allocation of public funds. This would not be in the public interest as public funds could be allocated in a way that would distort regional need for development.
- The consequences of releasing data at a time when negotiations/proposals are ongoing would significantly prejudice the Local Authority's ability to deliver the program. The program is a key scheme and failure to deliver could lead to significant planning harm to the local area and affect the Local Authority's ability to achieve the targets set out in their Local Plan. Therefore, release would be likely to put potential homes in jeopardy and affect Homes England's ability to deliver against its objectives in our strategic plan, which is not in the public interest; and
- Homes England has been unable to identify a wider public interest in disclosing the information requested.

Having considered the arguments for and against disclosure of the information, we have concluded that at this time, the balance of the public interest favours non-disclosure.

The full text of Regulation 12(5)(e) in the legislation can be found via the following link: [The Environmental Information Regulations 2004 \(legislation.gov.uk\)](#).

### **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](mailto:infogov@homesengland.gov.uk)



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Windsor House  
50 Victoria Street  
London  
SW1H 0TL

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

OFFICIAL

## CAMBRIDGE WATER RECYCLING CENTRE

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### OPINION

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#### 1. INTRODUCTION

- 1.1. I am asked to express my opinion as to whether the proposal to construct a new Water Recycling Centre (“WRC”) to serve the Cambridge Region would constitute a Nationally Significant Infrastructure Project (“NSIP”).
- 1.2. For reasons set out below, I am of the opinion that the proposed WRC falls within the statutory parameters set out in the Planning Act 2008 (“PA08”) and, accordingly, constitutes a NSIP.

#### 2. THE WRC AND ITS PROCESSES

- 2.1. Anglian Water Services (“AWS”) currently operate a WRC at Milton, in an area known as the Cambridge Northern Fringe. The WRC comprises the “*Cambridge Waste Water Treatment Plant*” (“CWWTP”) with its integrated Sludge Treatment Centre (“STC”). The integrated STC incorporates into

the overall WRC process both sludge treating components and combined heat and power plant (“CHP”).

2.2. The WRC inlet receives urban waste water comprising waste material which is carried in water through the City’s sewer system. The waste material and foul water are then subjected to a number of processes, the purpose of which is to produce benign water and other benign residual material which is capable of being safely returned to the wider environment. Importantly, at an early stage in the processing of the contents of the sewers, solid material is, to some degree, separated from water; later processes produce further extracted water as solids are treated.

2.3. The separated suspended solids enter a process whereby they are digested anaerobically. This digestion process produces further waste water, by extraction. That water is not returned straight to the environment, because it requires treatment before this can happen. It is, instead, piped back into the flow of waste water described above and, after biological treatment, returned to the river as effluent.

2.4. The dewatered solids, at the conclusion of the digestion process are reduced to:

- (a) methane, used to generate heat, which is required to activate the water treatment processes, and power in the form of electricity, some of which is utilised on site and some of which can be exported to the grid;



(b) agricultural produce in the form of a dry, soil-like substance which is benign and can be used to fertilize fields.

2.5. The stages of treatment described in paragraphs 2.3 and 2.4 above occur in the equipment forming the “STC”. This part of the WRC is physically and functionally connected and integrated to the WWTP equipment by pipes for the transmission of suspended solids and liquids extracted as described in paragraph 2.3 above. At this stage of the process, the solution is in suspension at a ratio of 2:98 (98% water) [point number 1 on the attached flow chart]. After digestion, the liquors which re-join the water purifying process commenced earlier are in suspension at a ratio of 0.1:99 (99% water). [Point number 2 on the attached flowchart]. Relative quantities of suspended solids passing from the primary tanks into the water purification system are 1% dry solids [point number 3 on the attached flowchart] and from the primary tanks into the Sludge Treatment Centre it is 2% [point number 4 on the attached flow chart] dry solids.

2.6. As explained above, the existing works receives the entire contents of the City of Cambridge’s sewers, as would the new facility. In addition, the new WRC would process waste water from Waterbeach Village and Waterbeach New Town, together with an element of growth. The capacity to deal with water from these sources would have a population equivalent of c.230,000.

2.7. Additionally, the capacity of the existing STC is 12,000 tonnes of sludge per year which equates to a population equivalent of 548,000.

2.8. The new WRC would, in addition to processing the City of Cambridge's and Waterbeach's waste water, also treat suspended solids derived from a number of existing waste water treatment plants in the AWS region. That material would be brought by tanker and join the process at an early stage of treatment, equating to the liquid piped into the STC on site at the early stage of purification described above at paragraph 2.3. It would merge with the Cambridge/Waterbeach fluids, undergo digestion and complete the separation of water from solids, with water extracted in the STC being piped into the WWTP along with that derived from Cambridge and Waterbeach.

2.9. Therefore the new WRC would comprise four main groups of structures:

- (i) connecting tunnels to convey the waste water and the materials it contains from the existing WRC to the new one;
- (ii) a connecting pipe intercepting the Waterbeach catchment sewerage to convey waste water and materials to the new WRC and to take treated effluent from the new WRC to the receiving watercourse; STC equipment which would treat and dewater suspended solids from the WWTP together with imported material from the small works elsewhere in the region; the new STC, like the existing one, would include an integral combined heat and power engine.

The population equivalent of the capacity of these new works would be 1.23 million in total, broken down as follows:

- WWTP - 230,000
- STC - 1 million

### 3. LEGISLATIVE FRAMEWORK

3.1. Part 3 of the PA08 deals with the definition of NSIPs.

3.2. S.14(1) includes:

*"(o) the construction or alteration of a waste water treatment plan [or of infrastructure for the transfer or storage of waste water]."<sup>1</sup>*

S.14(2) makes ss.(1) subject to sections 15 to 30 of the Act.

3.3. S.29 provides as follows:

#### ***"Waste water treatment plants***

*(1) The construction of a waste water treatment plant is within section 14(1)(o) only if the treatment plant (when constructed)—*

- (a) will be in England, and*
- (b) is expected to have a capacity exceeding a population equivalent of 500,000.*

*[(1A) The construction of infrastructure for the transfer or storage of waste water is within section 14(1)(o) only if –*

- (a) the works will be carried out wholly in England and the infrastructure will (when constructed) be wholly in England.*
- (b) The main purpose of the infrastructure will be –*
  - (i) the transfer of waste water for treatment, or*
  - (ii) the storage of waste water prior to treatment,*

*or both, and*

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<sup>1</sup> Words in square brackets added by the Infrastructure Planning (Waste Water Treatment and Storage) Order 2012, 8.2.

- (c) *the infrastructure is expected to have a capacity for the storage of waste water exceeding 350,000 cubic metres.]*
- (2) *The alteration of a waste water treatment plant is within section 14(1)(o) only if—*
  - (a) *the treatment plant is in England, and*
  - (b) *the effect of the alteration is expected to be to increase by more than a population equivalent of 500,000 the capacity of the plant.*
- [(2A) *The alteration of infrastructure for the transfer or storage of waste water is within section 14(1)(o) only if –*
  - (a) *the works will be carried out wholly in England and the infrastructure will (when constructed) be wholly in England.*
  - (b) *The main purpose of the infrastructure will be –*
    - (iii) *the transfer of waste water for treatment, or*
    - (iv) *the storage of waste water prior to treatment,*
  - or both, and*
  - (c) *the effect of the alteration is expected to have a capacity for the storage of waste water exceeding 350,000 cubic metres.]*
- (3) *“Waste water” includes domestic waste water, industrial waste water and urban waste water.*
- (4) *The following terms have the meanings given by regulation 2(1) of the Urban Waste Water Treatment (England and Wales) Regulations 1994 (S.I. 1994/2841)—*
  - ‘domestic waste water’;*
  - ‘industrial waste water’;*
  - ‘population equivalent’;*
  - ‘urban waste water’.”<sup>2</sup>*

3.4. For completeness, it should be noted that Hazardous Waste facilities are dealt with separately under s.30 PA08. None of the waste to be processed at the new facility falls within the definition of hazardous waste, so this section is irrelevant.

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<sup>2</sup> The words in square brackets were added by the Infrastructure Planning (Waste Water Treatment and Storage) Order 2012. S.2. The Explanatory memorandum to this Order, in Section 7 “*Policy Background*” makes clear that the amendments are intended to bring within the DCO regime “*proposed major sewers*” and the Waste Water NSIP makes clear that the Government had in mind the Thames Super Sewer.

3.5. A “waste water treatment plant” is not defined.

3.6. “Waste water” is defined inclusively by reference to s.2(1) of the Urban Waste Water Treatment (England and Wales) Regulations 1994 which provides as follows (so far as relevant):

*““domestic waste water” means waste water from residential settlements and services which originates predominantly from the human metabolism and from household activities;*

*“population equivalent” is a measurement of organic biodegradable load, and a population equivalent of 1 (1 p.e.) is the organic biodegradable load having a five-day biochemical oxygen demand (BOD5) of 60g of oxygen per day (the load shall be calculated on the basis of the maximum average weekly load entering the treatment plant during the year, excluding unusual situations such as those due to heavy rain);*

*“industrial waste water” means any waste water which is discharged from premises used for carrying on any trade or industry, other than domestic waste water and run-off rain water;*

*“urban waste water” means domestic waste water or the mixture of domestic waste water with industrial waste water and/or run-off rain water;”*

3.7. “Sludge” is separately defined by the 1994 Regulations as follows:

*““sludge” means residual sludge, whether treated or untreated, from urban waste water treatment plants;”*

3.8. “Sludge,” in the statutory sense, is a residual product arising from the process of urban waste water treatment. Regulation 4(1)(b) and (4)(b) and (c) impose a duty on AWS to reuse treated waste water and sludge arising from waste water treatment whenever appropriate and to ensure that disposal routes for treated waste water and sludge minimise the adverse

effects on the environment. Regulation 6(2)(d) imposes stringent duties with regard to the discharge of sludge.

#### 4. APPLICATION TO THE PROPOSED WRC

4.1. The threshold questions under s.29(1) PA08 are:

- (i) Will the proposed WWTP be in England? and
- (ii) Is it expected to have a capacity exceeding a population equivalent of 500,000?

4.2. Question (i) is easily answered in the affirmative.

4.3. Question (ii) requires consideration of the technical information set out above.

4.4. Some 230,000 head of population will be catered for in respect of turning foul water into benign effluent.

4.5. As explained above, an essential aspect of treating the “*urban waste water*”, as defined in the Regulations, is the removal of solids from it. The proposed STC would, as at present, receive solids from the water treating equipment at the WRC. These solids would be suspended in a certain amount of waste water; waste water would be extracted from them by subjecting the solids to further processes. Moreover, the heat generated in the CHP machinery within the STC would be used to activate the biological

treating of the water.<sup>3</sup> Electricity generated in the CHP boiler would power all parts of the WRC, as it does at present. All of these functions would occur, as they do at present, on the one site, albeit better laid out than the existing WRC, which has developed over time. The component parts of the proposed WRC would thus be entirely integrated and mutually self-supporting. The dry, benign residual sludge to be discharged to the environment would, like the effluent, derive from the process of waste water treatment.

- 4.6. In my opinion, the proposed WRC would fall within s.29 PA08. The waste water entering at the inlet works from the sewers of Cambridge and Waterbeach and from further afield would fall within the definitions of domestic, industrial and urban waste water. The treatment process would be an integrated one, combining various techniques of separating out and treating solids, transferred from one part of the facility to another in solution via pipes. Digestion of these suspended solids would extract waste water which would then be returned to the wet part of the process, whereas dry solids would emerge as treated residual sludge at the end of the process, along with treated water. Both elements would be returned to the environment in a usable form in accordance with duties imposed by the Regulations. The CHP would also be integral to the water treatment process, yielding essential heat and power. Therefore the combined capacity of the WWTP and STC elements of the WRC falls to be

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<sup>3</sup> This process occurs through the agency of live organisms whose temperature needs to be regulated to achieve an efficient operation.

considered. The combined capacity of 1.23 million population equivalent comfortably exceeds the threshold.

- 4.7. For completeness, I should mention Annex B to the CLG Associated Development guidance. Included amongst the examples of associated development specific to individual types of major infrastructure projects for Waste Water Treatment Plants are “*storage facilities (such as for sludge, grit etc.)*” and “*sludge handling facilities including incineration*”. As paragraph 12 of the guidance makes clear, the Annexes provide examples of the type of development that may qualify as associated development and they are illustrative only. In particular, bullet point 3 states:

*“These annexes should not be treated as an indication that the development listed in them cannot in its own right constitute a project, or an integral part of a project, for which obtaining development consent is mandatory under the Planning Act.”*

- 4.8. The illustrative examples mentioned above should, therefore, not be regarded as authoritative or prescriptive of the approach to any particular proposed project. They are also clearly distinguishable from the STC, which is neither a storage facility nor a handling nor incineration facility for sludge. As explained above, it is an integral part of the waste water treatment process, turning suspended foul solids into usable residual sludge and returning foul water to the water treating processes.



reg. 13  
22 January 2019

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**CAMBRIDGE WATER RECYCLING  
CENTRE**

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**OPINION**

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# Wastewater Flows Within Wastewater Treatment Plant

