

**CWWTPR DCO Examination****Submission by Save Honey Hill Group 6 December 2023****SHH Comments on South Cambridgeshire DC Response to ExQ1 (REP1-140)**

The SHH comments follow the order of responses in the SCDC Response (REP1-140). These comments should be read in conjunction with the SHH Response to the SCDC LIR (SHH 20).

| Question Number  | SHH Comments   | References to SHH or Other Submissions     |
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| 2. Principle     |  |  |
| 2.1              | SHH disagrees with the conclusion of note 3. The NPSWRI cannot be of any direct relevance to the determination of this application   |  |
| 2.2 a), b),c)    | SHH agrees with the statements made by SCDC  |  |
| 2.3 a)           | SHH position in relation to the applicability of NPSWW is clear in submissions already made.   | SHH RR-035<br>SHH REP1-171<br>SHH REP1-170 |
| 2.13 k) and 2.14 | See SHH 20 Response to SCDC LIR, REP1-139 paras 6.33 to 6.116  | SHH 20 response to SCDC LIR (REP1-139)     |
| 2.25             | SHH agrees with Answer 2   |  |
| 2.31 f)          | SHH does not agree with the housing figure of '325'. See SHH 20 Response to SCDC LIR, REP1-139 paras 6.34 to 6.36; 6.35; 6.99  | SHH 20 response to SCDC LIR (REP1-139)     |
| 2.32 d)          | These answers are clearly at odds with the evidence SHH has provided in REP1-171 at 4.5 in relation to high quality housing development in close proximity to major WWTPs for example at Rainham. It ignores that it is obviously technically feasible to remove or much diminish the odour from an improved and consolidated works. | SHH REP1-171                               |

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| 5. Biodiversity                        |  |  |
| 5.13                                   | SHH supports the wording for Requirement 11 originally proposed by Natural England in RR-015 for Quy Fen.  |  |
| 5.14                                   | SHH endorses the comments made by SCDC about the inadequacy of these management plans  |  |
| 5.21                                   | SHH welcomes the concept of a reed bed system for ecological reasons. However, consideration of the impact this would have on FP 85/6 will be required. It would not be acceptable for there to be a permanent diversion of this path away from the riverside to accommodate any reed bed. The essence of this path is that it follows the river bank closely between Fen Ditton and Bait's Bite Lock. |  |
| 5.39<br>Answer 2                       | SHH strongly endorses Answer 2. Mature trees within limits in particular along the pipeline and tunnel routes are not adequately protected under the provisions of the Order, a point that has been made in SHH submissions on the DCO at ISH1 (REP1-169) and subsequently in writing to the Applicant. The Applicant has yet to respond.  | SHH REP1-169                           |
| 6. Carbon Emissions and Climate Change |  |  |
| 6.11                                   | This answer appears to misunderstand the intent of the ExA question. It would be desirable for a 'baseline' or 'benchmark' assessment of operational carbon to have been provided for the existing works in order to help compare the extent to which the new works will represent an improvement in carbon emissions (SHH REP1-171 Section 9.2)   | SHH REP1-171                           |
| 6.44 Carbon Management Plan            | SHH has commented on the relevant section 10 in SHH 20 Response to SCDC LIR (REP1-139). The Outline Carbon management Plan needs to be reformulated to give effect to firm commitments on the achievement of carbon targets and the need for continuous improvement during design construction and operation.  | SHH 20 response to SCDC LIR (REP1-139) |
| 15. Community                          |  |  |
| 7.25                                   | SCDC appear to have entirely changed a view presented as recently as in their RR-004 . SHH does not believe the proposed development will markedly increase parking pressure in the village of Horningsea, but is concerned that the recreational area around the new works and  | SCDC RR-004                            |

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|                        | <p>the access it gives to the wider footpath network is at risk of attracting visitors to the extent that, unless managed, there will be nuisance parking on highway verges or along Low Fen Drove way. There is also a concern that the loss of parking in the layby north of Horningsea village during construction of the Waterbeach pipeline will lead to nuisance parking by users. This layby is very well used at all seasons by walkers.</p>   |   |
| <p>7.35 Employment</p> | <p>SHH does not agree with SCDC presentation of Option 2 and refers the ExA's to Chapter 8 pg 36 and 37 of the CNFE Issues and Options Report (2014). Option 2 does not include any consolidation of the WWTP in the NE corner, or it being placed inside a building, this is reserved for Option3. (Note the key reference in the CFNE pg 36 Fig 6.2 to 'upgraded WWTP' refers to the upgrade of the WWTP 2014-15 referenced SHH REP1-171 para. 4.6.13.)</p> <p>Further, whilst SHH agree 24.9ha are allocated for office and R&amp;D use only in Option 2 all Options in this report relate to the original smaller CNFE site. The development area and employment opportunities are further expanded in NECAAP incorporating the Cambridge Science Park illustrated in Fig 11 of the Proposed Submission NECAAP (2021). It is evident the larger site area would provide larger employment opportunities of higher grade than would be attainable with the original development site area.</p> <p>It is SHH understanding that the SCDC identified Option 2 was not rejected, but a medium growth , employment-led development was identified as the most viable development and was reflected in the parameters put forward for an employment led development at NEC into the SCLP SS/4 and CLP Policy15.</p> <p>Chapter 8 Pg 37 of the CNFE Issues and Options Report (2014) references within Option 2 potential outputs of 300 dwellings near the station. This housing output has already been exceeded by current planning applications.</p> <p>SHH notes the Brookgate Ltd application on the gateway site to the north of Cambridge North station proposes 450 residences. The GCLP housing delivery tables presented in the GC Development Strategy (GCLP DS) page 83 identifies 650 homes for development ahead and independent of a WWTP relocation also referenced in supporting text page 101.</p> | <p>SHH REP1-171<br/>SCLP 2018<br/>CLP 2018</p> <p><a href="#">CNFE Issues and Options Report 2014</a></p> <p><a href="#">North East Cambridge Area Action Plan Reg19 2021 (Fig 11)</a></p> <p><a href="#">GCLP Development Strategy (DS) 2021</a></p> |
| <p>9. Design</p>       |  |   |

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| 9.2                     | SHH believes that it is highly desirable for there to be an Independent Design Panel to advise on detailed design and implementation. This has been a matter raised constantly by SHH during the pre-application phase, when the Applicant apparently chose to take advice from a Design Council Panel, but neither the membership nor its advice were ever made public. IDPs have worked very well on other major infrastructure projects eg HS2   |  |
| 11. Green Belt          |   |  |
| 11.6                    | SHH's position on very special circumstances is clearly recorded in evidence and submissions  | SHH RR-035<br>SHH REP1-171<br>SHH 20 Response to SCDC LIR (REP1-139) 7.14-7.15 |
| 14.Landscape and Visual |   |  |
| 14.2 (b)                | This does not accord with SCDC RR-004 where at para.71 SCDC indicate in consideration of the level of adverse effects identified through the assessments carried out which, in the case of historical assets include reference to LVIA outcomes (eg AW 5.2.13; REP1-023 para 4.2.44), that the adverse effects from the proposed landscape mitigation are greater than expressed in the applicant's assessment. See also SHH 20 Response to SCDC LIR (REP1-171) at 8.24   | SCDC RR-004<br>SHH 20 Response to SCDC LIR (REP1-139)<br>AW 5.2.13, REP1-023   |
| Water Resources         |   |  |
| 21.20                   | This is an extraordinary answer from the Greater Cambridge Shared Planning service, since it is their responsibility to plan for housing and employment provision in the Cambridge area. Their view on the adequacy of the sizing and capacity of the works insofar as it must reflect rates of future housing development and employment growth needs to be set out for the ExA. The Applicant remains reluctant to place any of that information before the Examination, but asserts without evidence, that the design capacity of 275 to 300,000 PE (determined in 2019 well before the publication of the GCLP First Proposals) reflects the up to date housing requirements (within the works catchment) as set out in the GCLP FP and, by implication, the higher figures in the GCLP DSU. SHH believes this statement to be incorrect. | GCLP First Proposals 2021<br>GCLP Development Strategy Up-date (DSU) 2023      |