

CWWTPR DCO Examination

Submission by Save Honey Hill Group 6 December 2023

SHH Comments on Cambridge City Council's Responses to ExQ1 (REP1-129)

6 December 2023

Save Honey Hill Group's responses follows the structure of the City Council's REP1-129

Paragraph References	SHH Comments on Response	References to SHH or Other Submissions
Q2.1 REP1-129 Answer b) note 3	The references to NPSWW's and NPSWRI's guidance on NSIPS do not apply as the Applicant has agreed that the PD is not an NSIP.	REP1-170 SSH ISH2 summary Section 2.2
Q2.2 REP1-129 Answer e)	City Council has not really answered this question. SHH has not found any non-waste water infrastructure developments, such as housing, which have relied on NPSWW to determine a need case.	REP1-171 SHH Written Representation Section 3.2.1; 3.2.2
Q2.3 REP1-129 Answers	SHH refers the ExA to the Principles of Development section in the SHH Written Representation	REP1-171 SHH Written Representation Section 3.2.2
Q2.6 REP1-129 Answer 1	SHH refers the ExA to its responses to City Council LIR	SHH 21 Sections 6.27; 6.31
Q2.7 REP1-129 Answer 1	SHH agrees that City Council and SCDC adopted Local Plans 2018 do not require the relocation of the WWTP and points out in its Written Representation, the PD's lack of compliance with both Local Plans	REP1-171 SHH Written Representation Section 6.3.1

Q2.10 REP1-129 Answer	As shown at 6.5 of City Council LIR, the Chronology of Feasibility was a document first produced in November 2021; this was in response to SHH's request for a Feasibility Statement as promised in the adopted Local Plans.	
Q2.11 REP1-129 Answer a)	SHH disagrees that any real weight should be given to the emerging GCLP and NECAAP given the early stage of preparation and uncertainty on future special strategy due to constraints on water resources.	REP1-171 SHH Written Representation Section 4.3.1; 4.3.2
Q2.12 REP1-129 Answers 1 to 5	SHH refers the ExA to its responses to City Council LIR	SHH 21 Sections 6.67; 6.68; 6.70; 6.71
Q2.13 REP1-129 Answer b) note 4	<i>'both emerging plans are predicated on the relocation of the WWTP and do not require the relocation to take place'</i> appears to be a matter of semantics given that at answer to Q2.10 City Council infers that it has been a long held aspiration to relocate the WWTP.	
Q2.14 REP1-129 Answer e)	The argument on <i>'removing land from the Green Belt'</i> seems incongruous; building an industrial facility on 100ha of Green Belt negates its function as described in NPPF and is simply building houses on Green Belt by proxy	
Q2.32 REP1-129 Answer d) note 1	SHH refers the ExA to other WWTPs upgraded on site and those with houses in closer vicinity than 400m.	REP1-171 SHH Written Representation Section 4.5.1
Q5.13 REP1-129 Answer	SHH refers the ExA to its responses to County Council's LIR on Biodiversity.	SHH 18 Sections 5.6; 5.16
Q5.21 REP1-129 Answer	SHH agrees with the recommendation by the EA for a reed bed at the outfall.	
Q6.11 & Q6.44 Answer	SHH does not agree with the emissions baseline and refers the ExA to the Carbon section of SHH Written Representation.	REP1-171 SHH Written Representation Section 9.2.1

Q9.2 Answer	SHH agrees with City Council that a Design Review would have been welcomed earlier with more involvement by local groups and agrees that Design Review is needed now.	REP-171 SHH Written Representation Section 8.1 and SHH Design Critique
Q10 Answer	SHH has submitted detailed comments on the dDCO and is in discussion with the Applicant.	
Q1 19.5 to 19.13 Answers	SHH refers the ExA to its comments on odour modelling, assessment and impacts in its Written Representation.	REP1-171 SHH Written Representation Section 10.6