

CWWTPR DCO Examination**Submission by Save Honey Hill Group 6 December 2023****SHH Response to Natural England Written Representation**

SHH's responses will follow the structure of the Natural England's Written Representation.

Written Representation Paragraph References	SHH Response	References to SHH or Other Submissions
1.1	Natural England's overall conclusions	
1.1.4 & 1.1.6	SHH agrees with the NE's categorisation of risk except for sections 1.1.4 Biodiversity net gain and 1.1.6 Ancient woodland and ancient/veteran trees, both of which we would categorise as red. Additionally we reinforce and add to NI's advice in Table 1 – see below.	
Part II Table 1	Natural England's detailed advice	
	National designated sites (biodiversity and geodiversity)	
2a	Stow-cum-Quy Fen SSSI recreational pressure SHH agrees that the PD would bring additional footfall and consequential harm to the Fen.	REP1-171 SHH Written Representation Section 10.2
2b	Black Ditch water quality monitoring SHH is concerned that the PD will result in ground or surface water contamination to Black Ditch with resulting contamination of Stow-cum-Quy Fen with potential impact on biodiversity, including fish and invertebrates. SHH is seeking the installation by the Applicant of pollution control measures to prevent the discharge of surface water from within the works into ditches and seeks Natural England's support for this.	REP1-171 SHH Written Representation Section 10.2.3

2d	<p>Groundwater monitoring</p> <p>The Environment Agency has not yet agreed the Outline Water Quality Monitoring Plan. SHH believes that a comprehensive programme of monitoring needs to be in place to identify any pollution during construction together with an agreed approach to remediation if any adverse effects are identified or contaminated discharges occur. SHH seeks Natural England's support for this request.</p>	REP1-171 SHH Written Representation Section 10.2.3
	Protected species	
3a	<p>Water vole & bat licences</p> <p>The Lighting Design Strategy (AW 5.4.15.3: AS-100) requires amendment to include details of the number, spacing and luminance of lights and to minimise light spread. Light at the height of stacks can impact bat navigation; low level lighting can affect invertebrate reproduction with consequential impact on water vole.</p>	REP1-171 SHH Written Representation Section 10.2.4
	Biodiversity net gain	
4b	<p>20% river unit BNG proposal submission</p> <p>SHH does not agree that this has been resolved. The length of river unit at the outfall and the disruption caused by effluent flow will result in loss of reed bed habitats resulting in possible biodiversity net loss. The Applicant has not, to date, proposed measures that will replace and maintain those habitats lost.</p>	REP1-171 SHH Written Representation Section 10.2
	Other valuable and sensitive habitats and species, landscapes, and access routes	
7	<p>SHH agrees that an updated LERMP is required that is focussed on ensuring that the landscape planting is successful, particularly in dry summers, and is managed over the long term to maintain the intended diversity and richness of habitats. SHH WR identifies permanent and temporary adverse effect on visual amenity. SCDC has also expressed significant concerns on impact of landscaping in its LIR.</p>	<p>REP1-171 SHH Written Representation Sections 7.5.1, 8.2, 10.2</p> <p>RR-004 SCDC Relevant Representation para. 71</p> <p>REP1-139 SCDC LIR Sections 8.4, 8.5, 8.13, 8.16</p>

Part III:	Natural England's response to the Examining Authority's first written questions at D1	
Table 2	SHH agrees with NE's responses to ExQs 1.4.9, 1.5.14, 1.5.2.1, 1.5.34.	
5.39	SHH does not agree with NE's broad support for this conclusion; the loss of reed bed habitats at the outfall area is significant and would have a negative effect.	REP1-171 SHH Written Representation Section 10.2.3
7.29	SHH agrees monitoring of recreational pressure is needed before and during construction and during operation both at the PROWs and at Stow-cum-Quy Fen.	REP1-171 SHH Written Representation Sections.2 REP1-166 Quy Fen Trust WR Sections 6.2 & 6.6
Part IV	Natural England's detailed comments on the Development Consent Order (DCO) and associated documents	
Table 3 10 (1)	SHH agrees with Natural England's comments as set out in Table 3 but would raise the risk category for 10(1) to red.	