

CWWTPR DCO Examination**Submission by Save Honey Hill Group 6 December 2023****SHH Response to Cambridgeshire County Council Local Impact Report**

Save Honey Hill Group's responses follow the structure of the CCC LIR and notes the references to RR-001, the CCC Relevant Representation.

Local Impact Report Paragraph References	SHH Response	References to SHH or Other Submissions
1.12 & 1.13	The existing CWWTP is described as a brownfield site. It is, in reality, an important urban industrial site, with only part underused. The proposed relocation site is described as greenfield. It is and, crucially, it forms part of the unspoilt Green Belt around Cambridge, meeting the description and objectives of NPPF.	
2.3	The references to NPSWW's guidance on NSIPS do not apply as the applicant has conceded that the PD is not an NSIP.	REP1-170 SHH ISH2 section 2.2
Section 2 and 3.10	The CCC has set out the relevant policies; SHH has challenged the compliance of the application with these policies in SHH 04 Written Representation. SHH agrees with CCC that Green Belt policy as set out in the NPPF and in adopted Local Plans should apply and be given full weight in the decision making.	REP1-170 SHH WR section 7.2.1
Impact by Topic		
Topic 2	Agricultural Land and Soils	
6.3 & 6.4	SHH agrees that there are no positive or neutral impacts during the Construction Phase and that the temporary and permanent effects on loss of agricultural land and soil degradation are negative impacts.	
6.11 to 6.14	SHH also agrees that the Operational Phase will have no positive or neutral effects and that the permanent loss of agricultural land has negative impact. A Detailed SMP is required to further	

	address the impact, both temporary and permanent, of the Waterbeach pipeline construction and the transfer tunnel.	
Topic 3	Biodiversity	
5.6	SHH agrees that a detailed LERMP should incorporate a BNG plan and questions whether 20% BNG can be achieved, recognising the possible permanent effects on sensitive habitats such as those of bats and the endangered species of Hymenoptera and damselfly along Low Fen Drove Way from lighting. The impact of increased footfall and possible groundwater pollution on habitats at Quy Fen SSSI are also a concern.	REP 1-171 SHH WR section 10.2.4 RR-083 Section 7
5.9 & 5.10	The CCC's concern about whether successful on and off-site habitat creation, in particular tree and shrub growth, can be achieved and maintained is shared by SHH, especially the riverine habitats along the River Cam. Successful habitat trading is difficult to achieve given the different soil, hedgerow and tree and water conditions in new locations and the impact of lighting, vibration and dust.	REP 1-171 SHH WR section 10.2.1
5.11	SHH agrees that impact on BNG river units needs to be managed and should be Included In the Construction Outfall Management and Monitoring Plan.	
5.16	SHH agrees with CCC's assessment of impact on Quy Fen SSSI (5/16/& 5.17) and the lack of mitigation measures for Black Ditch resulting in the risk of contamination of both. This could be addressed by fairly simple physical pollution control measures.	REP 1-171 SHH WR section 10..2.3
5.24	SHH agrees that there is insufficient protection for the veteran and mature trees in the northern sector of the red-line boundary during construction of the Waterbeach pipeline and has requested the Applicant to modify the dDCO to secure their protection.	
5.27 & 5.28	SHH also agrees that there will be permanent loss of water vole habitat, adverse impact on common reptiles and insufficient mitigation strategy.	

Topic 4	Carbon	
6.5	SHH views on the Applicant's chosen baseline for Construction Phase are set out in SHH's Written Representation. SHH notes CCC's comment that there will be significant adverse effects at both construction and operational phases.	REP 1-171 SHH WR Section 9.2
6.12	SHH 04 also assesses the comparative emissions from the two options of biomethane production and CHP production and agrees with CCC on its assessment.	
6.16	CCC has not included comments on the lack of an assessment of the carbon impact of demolition and remediation of the current site.	REP 1-171 SHH WR Section 9.3.
	CCC has not assessed the modelling of carbon emissions associated with the proposed NECAAP development or its suggested alternatives in relation to emissions from buildings or commuting. SHH has reviewed this and considers that the analysis is misleading and flawed in relation to both buildings and travel.	REP 1-171 SHH WR Section 9.5.4
Topic 5	Health	
7.7	CCC has not questioned the robustness of the Applicant's MWIA for assessment of impact on health. The limitations of the desk-top derived evidence have produced erroneous data on the number and type of businesses in the area and thereby fails to assess the true impact of the PD on health and wellbeing.	REP 1-171 SHH WR Section 10.3.3 (i)
7.7	SHH believes that the Community Questionnaire was very limited and agrees with CCC that the perceived impact of construction and operational traffic on access to Fen Ditton School is therefore not assessed nor proposals for mitigation included.	REP 1-171 SHH WR Section 10.3.4 (iii)
Topic 8	Landscape and Visual Amenity	
10.7	CCC's comment on Green Belt is not robust enough. We believe that more weight should be given to the NPPF and local plan Green Belt policies and note that development on this area of GB is	RR-035 RR Sections 5.7; 7.1; 7.2

	contrary to both Cambridge City and SCDC adopted Local Plans 2018. There are no 'very special circumstances' that would justify this development, contrary to Green Belt policy.	SHH 04 Written Representation Sections 7.2.1; 12.2.1
10.10; 10.11	SHH agrees with CCC concerns on the impact of the PD on PROWs, the negative impact of PROW safety gates during construction and the temporary stopping of PROWs.	SHH 04 Written Representation Section 7.5
Topic 11	Traffic and Transport	
13.23	SHH agrees that the CTMP should give further details on how restrictions on construction traffic will be monitored and enforced with especial note to restrictions at Horningsea High Street, Clayhithe Bridge and Station Road, Waterbeach and compliance with restrictions for HGV access and egress.	REP 1-171 SHH WR Sections 13.3.3.3; 13.3.3.8
13.26 Table	SHH endorses CCC's call for specific mitigation measures in relation to suitable routing agreements for CA2 to CA20, including the weight and hours limitations noted in comments at COA1. SHH agrees with the CCC comments on CA10 to CA12. SHH agrees that more detail is needed on mitigation at points where the private roads CA13 to COA24 interact with public highway. CA4 to CA6 will require mitigation measures agreed with National Highways and also be subject to peak hour time limitations.	

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