

CWWTPR DCO Examination**SHH 20****Submission by Save Honey Hill Group 6 December 2023****SHH Response to South Cambridgeshire DC Local Impact Report (REP1-139)**

The responses below follow the numbering in the SCDC Local Impact Report (REP1-139). Wherever possible, we have sought to keep our responses consistent where the same or similar points are made by each of the three relevant planning authorities.

Local Impact Report Paragraph References	SHH Response	References to SHH or Other Submissions
4.1	The SHH position in relation to the NPSWW and the s35 Direction has been set out in the RR-035 and the Written Representation REP1-171 et seq. and, most recently, in the SHH oral submissions at ISH2, REP1-170	SHH RR-035 sections 3 and 4 SHH REP1-171 section 3 and 4 SHH REP1-170 section 2
4.8	Clearly, it is SHH's position that since the Proposed Development is not an NSIP, the NPPF is the principal statement of national policy to be taken into account by the ExA in reaching a decision.	
6.3	The Council has adduced no evidence that development has been 'effectively sterilised' on land to the south and west of the existing works. See for example, modern office development on Cambridge Business Park and to the west of Cowley Road (and more recent applications eg Merlin Place and Brookgate Limited for the land north of Cambridge North Station). The ExA now has an updated schedule of planning permissions and relevant applications and can judge this point for itself.	
6.14 odour contours and Chesterton Sidings	This statement is misleading. The sidings were mainly within the odour contours as defined at that time.	
6.24	The HIF application did not set out any other option than full relocation of the WRC. It did not explore any other, lower cost, options for achieving some or all of the desired planning outcomes eg consolidation and improvement. The HIF valuations took a very conservative view of viability, including assuming that the owners of the WRC and adjacent land could	

	expect to receive full greenfield residential development land values. Review of those appraisals, even without considering increases in residential sale prices since 2018, suggest that consolidation of the existing works, including extensive new facilities and carbon reduction measures, would be fundable, based solely on the high values achievable for life sciences, office and residential development on land to the south of the consolidated works.	
6.27	The final sentence does not explain the failure to undertake the promised feasibility studies set out in paras 3.34/3.35 of the adopted local plans.	SCLP 2018 Policy SS/4 CLP 2018 Policy 15
6.28	The HIF grant approval is not a 're-envisioning' since that is not a matter for the Government as grant giver. Any visions or plans for development must be brought forward through properly tested Local Plan documents.	
6.33 Overarching allocation in Policy 1 of NECAAP	<p>Employment generation in the order of 15,000 jobs is not dependent on a relocation of the WWTP. These employment growth targets with a mixed use development, including homes in the area of the new station, were identified without the relocation of the WWTP in Cambridge Northern Fringe East Area (CNFE) Issues and Options Report (2014) Chapter 8 pg 36 & 37.</p> <p>The CNFE boundary did not include the large northern section now in NECAAP. It is likely that employment targets way in excess of 15,000 can be attained without the relocation of the WWTP within a mixed use city district with lower housing targets.</p> <p>SHH also notes and has responded to the SCDC ExQ1 Response 7.35 in SHH18.</p>	<p>CNFE Issues and Options Report 2014</p> <p>SHH 18 Comments on SCDC Response to ExQ1 (REP1-140)</p>
6.34 final sentence to 6.36	This analysis is based on what can be described as a very cautious, 'can't do', attitude towards accepting the feasibility of residential development in the NECAAP area, based on the 'worst case' odour modelling in the 2018 Odournet report. The ExA should ask the Applicant and both local authorities for a mapped analysis of odour incidents and complaints recorded in, say 2012 and 2022, with a related commentary on the extent of the existing residential uses and the 'nuisance' ratings applied by Odournet. There has been a locally perceived measurable reduction in odour from the works over this period, which should be recorded in this data.	

	In particular, SHH believe that there is no compelling evidence to seek to prevent redevelopment of either the Trinity Hall or Nuffield Road Industrial Estates for residential use, nor for any restrictions on the majority of the Cambridge North station 'gateway site'. As already demonstrated in recent applications, there are no constraints on life sciences or other office development and a substantial appetite among landowners for pursuing these. Targeted improvements to odour emissions and consolidation could release far more land to the north and east of Cowley Road for high quality mixed use development.	
6.44	Given the location of this site and its access, there are good reasons to permit the redevelopment of the Trinity Hall Industrial Estate for principally residential and related community uses.	
6.35 Two land parcels and 250 dwellings lying outside the odour contours.	This conflicts with the GCLP DS 2021 pg.83 housing delivery tables showing 650 homes of the 3,900 for delivery at North East Cambridge (NEC) in the GCLP plan period prior to 2030 and thus ahead of any WWTP relocation. It is assumed the 650 homes relate to current planning applications relating to Chesterton Sidings and others described as independent of a relocation of the WWTP referenced in the GCLP DS pg.101. See also SHH Comments on SCDC LIR, REP1-139 para 6.99 below.	GCLP Development Strategy (DS) 2021
6.73	This is an important statement regarding the uncertainty that exists in relation to the housing requirements and strategic locations to be brought forward in the GCLP and hence the weight that can be attached to that plan's First Proposals.	
6.79 to 6.81 Alternative Strategic Scale Options	SHH REP1-171 at 6.6 has demonstrated that there is sufficient capacity in the GCLP amongst new and existing strategic sites including a substantial amount with permission to accommodate the homes specified in NECAAP without requiring an additional new strategic site and/or use of greenfield or Green Belt above those already in the plan or proposed in the First Proposals. As outlined in SHH REP1-171, existing larger strategic sites are identified in the GCP Development Strategy Report as of similar sustainability to NECAAP founded on the intention that these larger sites will incorporate integrated transport infrastructure / transport corridors.	SHH REP1-171 GCP Development-Strategy-Options-Summary-Report-2020

	<p>As examples, the proposed new strategic site of Cambridge Airport (capacity 7,000 homes) and existing new strategic site at Waterbeach (capacity 11,000 homes) are close enough to North East Cambridge and Cambridge Science Park for active non-motorised travel and both will be connected to the Cambridge network of cycleways. Waterbeach already has high frequency park and ride bus services linking the two locations. Cambridge Airport will be linked by segregated bus and cycle links to all key locations in the City.</p> <p>The Strategic sites at Waterbeach , Cambourne (capacity up to 10,000 homes) and Cambridge Bio-Medical Campus (capacity up to 5,000 homes) will all have rail links to Cambridge North station at North East Cambridge and thus, Cambridge Science Park, as well as segregated bus links to all key locations in the City .</p> <p>The statement made in the second bullet of SCDC LIR, REP1-139 at 6.80 represents a very short term and incremental view at odds with the Government’s aspirations for the Cambridge area in Cambridge 2040. Further substantial growth will have to contemplate, at the least, several new settlements eg to the south and east of Cambridge as well as active dispersal of growth into the market towns around Cambridge.</p>	
6.84	The ExA should note this important caveat.	
6.99 ‘Only sites located outside of the odour extents..some 325 dwellings across NEC at most.’	See SHH comments on SCDC LIR, REP1-139 para 6.35 above.	
6.101	See SHH Comments on SCDC LIR, REP1-139 paras 6.79 to 6.81 above. North East Cambridge, quite rightly, will remain an important commuter destination as one of three locations in the City with mainline rail links. Housing at NEC will generate commuting in both inward and outward directions.	
6.106	SHH position is that HIF is not essential to secure viable high quality development of underused land at North East Cambridge. This can be funded via development returns.	

6.111 and 6.112 Contribution to Cambridge Economy	The employment generation opportunities at North East Cambridge and the additional significant contribution it could make to the local Cambridge and national economy is not primarily dependent on a relocation of the CWWTP. High quality employment floorspace is already becoming available to the east of Milton Road in close proximity to the existing and potentially intensified Cambridge Science Park.	
6.112 'The provision of 8,350 net additional homes would make a substantial contribution towards meeting Greater Cambridge's housing needs to 2041 and well beyond and would support the continue economic growth of the area and Greater Cambridge.'	<p>SHH does not agree that the homes proposed at NEC within the plan period will make a significant contribution to the housing requirement to 2041.</p> <p>As presented in SHH REP1-171 at 6.6.4, the 3,250 homes dependent on WWTP allocated for build out at NEC within the GCLP plan period to 2041 represents only 7% of the housing requirement agreed and identified as deliverable in Greater Cambridge.</p> <p>Further, it is evident that existing and proposed strategic sites, absent NECAAP, will provide a large pool of sites, in excess of 15,000 for build out post 2041, of which 9,688 are already allocated with permissions and could accommodate any additional housing anticipated at NECAAP pre and post 2041.</p>	SHH REP1-171
6.115 "... and over 1 million square feet of much needed commercial life science research space."	A mixed development including 'over 1 million square feet of much needed commercial life science research space' is not dependent on a relocation of the WWTP.	
Topic 2 Green Belt Policy		
7.3	<p>In consideration of harm to the Green Belt, in addition to SCLP policy NH/8 , SHH considers the following SCDC Local Plan Policies are relevant to the PD located in the Green Belt between the villages of Fen Ditton and Horningsea:</p> <p>S/2 b: ' To protect the character of South Cambridgeshire, including its built and natural heritage, as well as protecting the Cambridge Green Belt. New development should enhance the area, and protect and enhance biodiversity.'</p> <p>S/4 'A Green belt will be maintained around Cambridge that will define the extent of the urban area...'</p>	SHH RR-035 at Annex A SCLP 2018

	<p>At para. 2.29 ...' The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and a specific function of some Green Belts, such as the one around Cambridge, is to preserve the setting and special character of historic towns..'</p> <p>SHH has set out in RR-035 Annex A a full list of policies with which the PD does not comply.</p>	
7.11	SHH agrees with this conclusion	
7.12	<p>In consideration of 'any other harm' SHH RR-035 and REP1-171 has referenced Green Belt Studies supporting the existing SCLP, CLP and GCLP which in consideration of the impact on the purposes of the Cambridge Green Belt, including defined special characteristics, concluded that any development within the vicinity would cause substantial harm/very high harm respectively to the purposes of the Cambridge Green Belt.</p> <p>SHH (RR-035; REP1-171) has submitted and provided supporting evidence that the Green Belt assessment undertaken by the Applicant has underestimated the adverse impact the PD would have overall on the Cambridge Green Belt, particularly in the context of Cambridge Green Belt Purpose 2, namely 'to maintain and enhance the quality of its setting' and an overestimation of the reduction in harm the mitigation measures will achieve. SHH takes the view that this harm should be rated as 'very high harm', not 'moderate' as assessed by the Applicant.</p> <p>Harm to the Green Belt would conflict with Local Policy SCLP - S/2; S/4; NH/8</p>	SHH RR-035 Section 7 SHH REP1-171 Section 7 AW 7.5.3; APP-207
7.14 Benefits	<p>SHH RR -035 Section 4.4 outlines the weaknesses in the stated housing and employment benefits claimed by the Applicant and are relevant here.</p> <p>Substantial redevelopment of the NEC area as identified in the Cambridge Northern Fringe East Area (CNFE) Issues and Options Report (2014) supporting the existing SCLP and CLP can be achieved without a relocation of the WWTP.</p>	SHH RR - 035 SHH REP1-171 SCDC REP 1-139 CNFE Issues and Options Report 2014

	<p>SHH REP1-171 section 4.5 has provided examples including financial costings of comprehensive upgrade programmes that have been conducted on both similar size and larger works, while fully operational and with housing in close proximity to the works, or developed subsequently.</p> <p>Retention of the Cambridge Water Recycling Centre (WRC) on the existing site would be more cost effective, more environmentally friendly and could still free up the majority of the Milton site for housing redevelopment.</p> <p>Further, the Applicant has ignored the potential benefits of using new and environmentally friendly technology which is being used elsewhere in the United Kingdom and elsewhere for larger plants and could significantly reduce the footprint of an upgraded WWTWP.</p> <p>As presented in SHH RR-035 at 4.4 the argument that NECAAP is the most sustainable strategic location in Greater Cambridge for housing development needs very critical scrutiny, both in absolute terms and in comparison, with alternative locations already set out in the emerging plan.</p> <p>Other strategic locations, such as Cambridge Airport, Waterbeach and Cambourne are or will be provided with high quality local public transport including dedicated bus ways and or rail services. All will have integrated public transport access to North East Cambridge and the Cambridge Science Park. In addition, Cambridge Airport and Waterbeach are close enough to North East Cambridge and Cambridge Science Park to benefit from active transport initiatives including the dedicated Cambridge Cycle Network.</p> <p>The quantum of housing attainable without a relocation of the WWTWP at North East Cambridge incorporating the larger development site of NECAAP than the earlier Cambridge Northern Fringe East has not been identified. Housing numbers attainable without a relocation presented in the LIR, REP 1-139 are based on the proposed land uses of NECAAP (Fig 11) and are predicated entirely on a relocation of the WWTWP.</p>	<p>North East Cambridge Area Action Plan Reg19 2021 (Fig 11)</p>
--	--	--

	<p>SHH has identified other constraints on the timely redevelopment of NECAAP. One of those not explored yet by the ExA to date is that there are strict limits to the NECAAP trip generation budget, derived from the primary road network capacity, at the Milton interchange and along the A10 corridor, which will adversely affect the ability of the NECAAP to deliver market appropriate housing. The North East Cambridge Core Site Up-date SU (2023) page 306 identified transport modelling could as yet ‘render NECAAP as unsound or could reduce the development capacity materially undermining the viability of the scheme.’</p> <p>Planning applications from landowners within NECAAP looking to meet the urgent demand for quality business and research employment floorspace, rather than housing, continue to come forward. For example, awaiting decisions are an application for demolition and erection of new research buildings (23/01487/FUL) at the St. John’s Innovation Park ; Cowley Road, change of use and refurbishment to create office space (23/01878/FUL); Milton Road/Cowley Road, demolition of 2,730 sqm (GIA) office building, erection of 13,096 sqm (GIA) of research and development accommodation (23/00835/FUL).</p>	<p>North East Cambridge Core Site Up-date 2023</p>
<p>7.15 Additional Benefits</p>	<p>SHH takes the view, supported by other key participants in this examination, that these benefits are being overstated and that there are substantial gaps and weaknesses in the mitigations being proposed by the Applicant that have yet to be addressed.</p> <p>The extent to which the existing WWTP could be expanded in the future alongside other environmental improvements identified here has not been established.</p> <p>In RR- 035 and REP1-171, SHH made its concerns clear on the threat to biodiversity posed by the PD and the associated changes to the area around. These concerns have been echoed in Natural England’s RR-015. It is not clear how the Applicant’s claim for biodiversity net gain (BNG) can be achieved given the effect on sensitive areas such as Quy Fen SSSI, Fleam Dyke SSSI and Wicken Fen SSSI.</p> <p>The Applicant recognises that the proposed new outfall location on the River Cam will result in river units and reed bed habitats loss (AW 5.4.8.13; AS-163 at 5.3.5) but does not offer a</p>	<p>SHH RR-035 SHH REP1-171 Natural England RR-015 Natural England REP1-164 National Trust RR-031 Quy Fen Trust RR-034 Quy Fen Trust REP1-166 CCC REP1-133 AW 5.4.8.13 AS-163</p>

	<p>resolution without which BNG cannot be achieved and may instead result in biodiversity net loss.</p> <p>SHH notes Natural England’s response to ExQ1.5.21 (REP1-164) that the loss of 1.06 reedbed habitat units in the outfall area have not yet been compensated for within the BNG arrangements.</p> <p>Natural England RR-015, National Trust RR -031 and Quay Fen Trust RR-034; REP1-166 have raised matters concerned with harm to biodiversity associated with increased visitor pressure arising from enhanced public routes and increased access. Assessment of risk and suitable mitigation measures have not yet been resolved (Natural England REP1-164, ExQ1.7.29).</p> <p>The new footpaths proposed within the immediate vicinity of the WWTP may have limited recreational value because of the risk of odour and the negative perception of the immediate environment surrounding a WWTP.</p> <p>SHH note Cambridgeshire County Council (CCC) REP1-133 at para 10.32 states ‘The perception of these changes by local communities and users may be as significant as the actual observable physical effects of the development and should not be discounted. The identified impacts cannot be completely offset by the measures currently proposed in the application, and therefore CCC seeks further mitigations to be agreed to ensure the PROW and NMU networks in the area can be enhanced in compensation for the enduring alterations caused by the development.’</p>	
<p>7.16 to 7.20</p>	<p>SCDC in this LIR, RP1-139 identify significant concerns with the landscape proposals intended to provide adequate mitigation, both in suitability of design and sustainability (Section 8). Logically, the conclusion from 7.20 is that, if presented to SCDC, this application would be refused on these grounds alone.</p> <p>SHH does not consider the requirements made by SCDC RP1-139 at 8.55 are sufficient to address these concerns to conclude here that the requirement of suitable mitigation measures to ensure the impact on the Green Belt is mitigated could be met through a robust landscape strategy. See also SHH comments on 8.43-8.45, 8.55, 8.56-8.57 below.</p>	

Topic 3 Landscape		
8.6, 8.13, 8.20	SHH agrees and supports these conclusions.	
8.21	SHH agrees and supports this request.	
8.22	As presented in SHH REP1-171 at para 8.2.8 a number of viewpoints should have been assessed and or other receptors included. A number of VP's are listed where in each case inclusion or amendments would make the visual impacts of greater significance than those set out in AW 5.2.15; AS-034.	SHH REP1-171 AW 5.2.15, AS-034
8.24	<p>SHH has submitted in RR-035 and RP1-171 that it considers there has been, generally, an under-estimation of the permanent adverse effects that the PD will have on the visual amenity of a significant number of receptors within 1km of the main site as assessed at Year 15. This arises mainly from an over-optimistic assessment of the screening effect that the landscape planting will achieve by Year 15.</p> <p>SHH RP1-171 at 8.2.1 also notes SCDC (RR-004 para.71) has expressed the view that the residual adverse landscape effects including in particular those arising from the proposed landscaping have not been fully represented in assessment outcomes.</p> <p>Many of the VPs are from PROWs. SHH Notes CCC, REP1-133 at 10.32 that no matter what screening measures are taken to shield users from the development when in operation, it remains the case that the proposals as a whole will, if delivered, represent a permanent change to the landscape in the area of the WWTP. Further, that the perception of these changes by local communities and users may be as significant as the actual observable physical effects of the development, and should not be discounted. CCC seek further mitigations to be agreed to ensure the PROW and NMU networks in the area can be enhanced in compensation for the enduring alterations caused by the development.</p>	SHH RR-035 SHH RP1-171 SCDC RR-004 CCC REP1-133
8.25	SHH agrees.	

8.31	SHH agrees and supports this request.	
8.32	SHH agrees and supports this conclusion.	
8.37	SHH agrees and supports this conclusion.	
8.43 to 8.45	SHH agrees.	
8.50, 8.52	SHH agrees and supports recommendations.	
8.55	SHH notes this conclusion but is concerned whether even these measures will be sufficient to deliver sustainable mitigation.	
8.56, 8.57	SHH agrees	
Topic 4 Historic Environment		
9.2 NH/14 Policy	<p>SCDC identifies here the policy requires that a 'Development should sustain and enhance the special character and distinctiveness of the district's historic environment including its villages and countryside and its building traditions and details.'</p> <p>However, in this LIR, RP1-139 at 9.8 to 9.11 SCDC limits heritage assets it considers relevant to: Baits Bite Conservation Area (HE095); Poplar Hall(HE040)and Biggin Abbey (HE094) and does not reference the impact on the villages of Fen Ditton or Horningsea and related Conservation Areas.</p> <p>It is the SHH view as presented in SHH REP1-171 Section 10.4.2.1 that the PD will have a cumulative adverse effect of significance on the three Conservation Areas of Fen Ditton, Baits Bite Lock and Horningsea all of which will be impacted by the PD when viewed travelling along important historical routes identified as contributing to the rural setting of the villages and circa 50 listed buildings within them.</p>	SHH REP1-171 Historic England REP1-158

	<p>SHH notes Historic England, REP1-158 at para. 2.12, identifies the PD site as ‘forming part of the wider setting of Bait’s Bite Lock, Fen Ditton and Horningsea conservation areas, and speaks to their significance as rural fenland settlements that historically relied on the rural economy for their prosperity’.</p> <p>Historic England conclude that the overall development would result in harm to Biggin Abbey and the three Conservation Areas and notes that this would amount to less than substantial harm.</p>	
9.16, 9.20, 9.22, 9.25, 9.28, 9.29	These conclusions are in accord with those reached by SHH and presented in RR-035 and RP1-171. SHH supports these conclusions	SHH RR-035 SHH RP1-171
9.41	SHH agrees that the impacts on Bait’s Bite Lock, HLCA22 and Biggin Abbey are at ‘the higher end of less than substantial harm’	
9.44	SHH agrees.	
Topic 5 Carbon		
10.7	SHH does not agree with this conclusion as set out in SHH REP1-171 in section 9.	SHH REP1-171
10.13	SHH evidence in REP1-171 is that the construction carbon reductions achieved during design have been overstated and that the carbon emissions recorded for the submitted design still fall far short of the Applicant’s own corporate target as noted by SCDC in this LIR, RP1-139 at 10.15.	SHH REP1-171
10.16, 10.30 and 10.31	<p>SHH has made the case that firm carbon reduction commitments need to be enshrined in the application and enforced through the Requirements.</p> <p>The operational requirement should be for net zero operation, but only taking into account on-site provision. Offsetting through, for example, carbon credits or subscription to off site sequestration is not acceptable.</p> <p>The Applicant should be required to undertake continuing carbon reduction not just to targets but to be ‘as low as reasonably possible’ through design, construction and operation.</p>	SHH REP1-171

10.33	SHH does not agree with this conclusion. The Applicant has yet to demonstrate that either the construction target or the operational net zero targets can and will be achieved.	
Topic 5 Ecology and Biodiversity		
	SHH agrees with all of the SCDC responses in 11.1 to 11.8, 11.10 and 11.12 to 14. The ExA is also asked to look at SHH's comments in RR-035 and REP1-171 and those on outstanding biodiversity issues as set out in comments on SCDC LIR, REP1-139 7.15 above.	SHH RR-035 SHH RP1-171
Topic 7 Odour Impacts		
13.3 and 13.11	SHH agrees with these points.	
13.12	The Applicant has not demonstrated that BPM has been applied to make odour impacts as low as reasonably possible. SHH RP1-171 section 4.5 has provided real life examples of works where odour footprints are far smaller than those modelled for the Proposed Development.	SHH RP1-171
Topic 9 Noise and Vibration		
15.8 and 15.11	SHH notes and agrees with these requests	
Topic 13 Public Rights of Way		
18.13 and 19.11	SHH understands that this bridleway is to be a public bridleway with unrestricted use, on foot and by equestrians and cyclists, and that these statements are incorrect. The Applicant and Cambridgeshire County Council need to confirm this.	
Permissive access	The new permissive footpaths proposed within the site of the WWTP may have limited recreational value because of the risk of foul odour and or negative perception of the immediate environment surrounding a WWTP perceived.	CCC REP1-133

	<p>SHH notes Cambridgeshire County Council (CCC) REP1-133 at para 10.32 state 'The perception of these changes by local communities and users may be as significant as the actual observable physical effects of the development, and should not be discounted. The identified impacts cannot be completely offset by the measures currently proposed in the application, and therefore CCC seeks further mitigations to be agreed to ensure the PROW and NMU networks in the area can be enhanced in compensation for the enduring alterations caused by the development.'</p>	
--	---	--