Horningsea Parish Council (HPC) response to Cambridgeshire County Council (CCoC) Local Impact Report (REP1-133)

REP1-133 Cambridgeshire County Council (CCoC) LIR Section no.	HPC response
1.12	HPC does not agree with the description of the site as a 'brownfield' site. The site is currently being used by a recently upgraded, fully functioning waste water treatment works. The wider area contains a range of operating commercial/industrial enterprises.
2.3	The Applicant has stated that the PD is not an NSIP; the National Policy Statement for Water Resources Infrastructure (NPSWRI) does not apply
Section 2 & 3.10	The CCoC has listed the relevant policies and HPC does not believe that the PD complies with these policies or with the Local Plan or with NPPF Green Belt Policy
TOPIC 2 Agricultural Land and Soils	HPC believes more suitable sites for the PD could have been found, or more sensible that the WWTP remained at Cowley Road. The majority of the land is BMV and HPC agrees with CCoC the impact is negative for the construction and operational phase.
TOPIC 3 Biodiversity	We are not confident that 20% BNG will be delivered. We have a lot of concern about the damage to the river bank and river wildlife and there is not a clear path to the delivery of the river units.
5.16	HPC shares the concern about the potential for pollution of Black Ditch with its connection to Stow-cum-Quy Fen SSSI. We are very concerned that CCoC cannot find any specific mitigation measures to protect Black Ditch, nor any monitoring programme to ensure the Black Ditch and Stow-cum-Quy Fen SSSI will not become contaminated. We agree with the CCoC concerns about dewatering and note the problems at Northstowe where the developer has damaged water flows to some important pond habitats. We share the concern of the CCoC at 5.42 that there is a potential for unsustainable recreational use of the SSSI and agree that regular surveys are needed to monitor use. Quy Fen Trust should be consulted and compensated for any remedial work that arises.
5.19-5.23 River Cam County Wildlife Site County Wildlife Site ('CWS')	HPC agrees with CCoC that the temporary impact would be of moderate significance. The Applicant acknowledges that work on the outfall would have a significant impact on River Cam – path users, river users and wildlife. The Lighting Assessment 5.4.15.3 estimates it would take 4 months to complete the outfall work during which a lit 40m x 25m compound would be set up, and would remain active for 12 months. Table 6.1 gives predicted construction effects as <i>major adverse</i> but short term. The magnitude of the work on the Outfall is causing concern amongst residents and the many users of the towpath and river.

	The impact on wildlife is also very worrying. In ExQ1 (PD-008) q5.34 the ExA asked about the habitat for otters at the outfall and HPC agrees with the concerns raised in the response by the Environment Agency (REP1-152) in that there was plenty of evidence of otter activity in the area, but that the search for holts was not carried out properly. Horningsea residents are aware of otters in this section of the river and would like them to be protected from disturbance and destruction.
5.27 Water Vole	HPC agrees with the CCoC's comments on the permanent loss of water vole habitat and the corresponding lack of detail on their care and relocation
5.27 Reptiles	HPC shares the concerns about the adverse impact on reptiles. And we support the request for a Reptile Mitigation Strategy within the LERMP. In addition the strategy for all other protected species mitigation, should be included in the LERMP together with a Construction Ecological Management Plan, which should form part of the CEMP – Requirement 9.
5.35 LERMP	We agree that the LERMP is far too limited and only provides for the core site. It should also set out how BNG will be measured and include BNG audits in years 1, 2, 3, 5 and every 5 years.
5.45 Low Fen Drove Way Grasslands and Hedges County Wildlife Site CWS – Light Spill	HPC is concerned about the impact of lighting on this dark area. We don't feel that the Lighting Assessment or Lighting Design Strategy [APP-072] provides enough detail on mitigation of impact of the light spill from the lights on the buildings above the bund, the 33% HGV traffic at night and the increased light at the new junction. We do not have confidence that the bat studies have been completed thoroughly.
TOPIC 4 Carbon	HPC believes that CCoC has not evaluated the models that have been presented on the carbon emissions from the development of North East Cambridge.
TOPIC 5 Health	HPC feels that the MWIA underestimates the impact of the PD on health and wellbeing and the CCoC should challenge this strongly. The impact on businesses has not been properly evaluated and the PD is causing worry about loss of livelihood. The impact of the PD on the mental health of residents has not been properly assessed. The area is affected by a number of committed developments and the cumulative impact of this is also underestimated.
TOPIC 8 Landscape and Visual Amenity	
10.10-10.14	We agree with the CCoC's concerns about the disruption to the important PRoW in this area.
10.32 – 10.35	We agree with the statement 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. The perception of these changes by local communities and users may be as significant as the actual

TOPIC 11 Transport and Traffic	observable physical effects of the development, and should not be discounted.' In view of the irreparable damage to the landscape, we agree with the CCoC's request for further mitigations to be agreed by way of contributions under S106. The 'perception' of the change is significant and links to the section above on wellbeing and mental health.
13.23	We totally agree with the CCoC's concern about the lack of detail about how the traffic will controlled in terms of route and timing. ANPR is cited but no detail about how this will actually work. There seems to be a lot of reliance on the community reporting transgressions that may be then 'investigated' and a decision eventually made about possible action etc There are a lot of voluntary agreements and aspirational statements but is anything enforceable? The CCoC says in its response to ExQ1 (REP1-134) q20.67 'c) A reporting system operates in Northstowe with limited success. However, it is important that the applicant does have a reporting system and acts on any incidents in a diligent way with sub contractors.'
	As a community we have to rely on the Applicant to control the traffic. The local authority does not have the resources to intervene promptly. The CCoC response (REP1-134) to q20.80, p238 on 'Operational traffic – acceptability of impacts' 'The OTMP would primarily be enforced by the applicant. However should they fail to do so, it would fall to the Local Planning and Highway Authorities to investigate any breach of protocol. This would have an impact on resources for both authorities meaning that timescales for enforcement could realistically be compromised.'
13.29	We share the concern of CCoC about use of the roads in the old village of Waterbeach and the potential for impact on the primary school. We agree that it would good to get an agreement with the developers of the WBNT to use their construction road network
13.32	We share the concern expressed about the introduction of a substantial number of new HGVs to this junction well in excess of the number that would ordinarily be using the junction.