

**Horningsea Parish Council (HPC) Response to South Cambridgeshire District Council (SCDC)
Local Impact Report, REP1-139**

SCDC LIR, REP1-139 Section nos.	HPC comments
3.2	<i>“This Victorian 40-hectare brownfield site”</i> is incorrect as the site is a fully functioning Waste Water Treatment Plant
3.3	There is no mention in the description, of the Conservation Areas which will be dramatically affected by the industrial development.
4.1	<i>“nationally significant waste water infrastructure projects”</i> – this is no longer classified as an NSIP. Also applies to 4.2, 4.3, 4.4, 4.5, 4.7
4.14	<i>“On 24 July 2023 the Prime Minister and Secretary of State for Levelling Up, Housing and Communities Government announced a long-term plan for housing including further plans for regeneration, inner-city densification and housing delivery across England and in particular identified Cambridge”</i> If there are going to be large increases in population in Cambridge the move to Honey Hill should be reevaluated.
4.15	The location of the move to Honey Hill could be inappropriate for a city that has a very large increase in population. A more decentralised approach could be more appropriate, retaining the WWTP at Cowley Road, or relocation to a site at a greater distance from the city of Cambridge. The whole strategy should be reassessed
6.74	<i>“what we do understand already is that once the reservoir is operational from around the mid-2030s there will be substantial water supply available”</i> Without adequate water the intended density is not feasible in the short term. The strategy for Cambridge is very much in flux
6.91	There is no real discussion here about the considerable carbon cost of moving a working WWTP from its location to Honey Hill nor is there any consideration of the destructive nature of building an industrial site at Honey Hill which will have a tremendous effect on the surrounding conservation areas of Horningsea, Fen Ditton and Stow-cum-Quy. With an increasing population, destroying a beautiful part of Cambridge will create a shameful legacy
6.95	Community consultation showed that a majority wished that the current plant should remain at its current location. Most of the feedback has been ignored by Anglian Water.
6.112	The NECAAP development is an atypical development for Cambridge having a high density with little open space and few amenities. It is incredible that an extra eight thousand homes will not considerably affect local traffic. The NECAAP development will only provide parking facilities for one fifth of its residents, asking the question will car ownership fill surrounding areas with parked cars? Also if residents do not have vehicles how much traffic from supermarket

	deliveries and home delivery vehicles will there be? It calls itself a sustainable development but it is hard to see.
6.113	If the government decide on a huge enlargement of Cambridge the city will need to retain green space.
6.116	It is strange that in considering this issue the site of the proposed plant is not considered or even mentioned. Honey Hill is green belt that is satisfying the reason for its existence, preventing urban sprawl and maintaining the link between its adjacent conservation areas of Horningsea, Fen Ditton, the River Cam and Stow-cum-Quy. In its slightly raised location in a flat Fen landscape its impact will be enormous.
6.118	<i>"A quarter with space for cutting-edge laboratories, commercial developments fully adapted to climate change and that is green, with life science facilities encircled by country parkland and woodland accessible to all who live in Cambridge"</i> This is a truly fanciful statement. The country parkland is a reference to Milton Country Park we presume. Another 8,000 people visiting on a sunny weekend would produce a similar condition as Kings Cross in the rush hour and we're not sure where the nearby woodlands are.
7.13	The SCDC statements on the Green Belt are convincing evidence that Honey Hill is an inappropriate site. The openness of the site is truly a factor for its rejection. Being on a slightly raised site it will dominate and destroy the character of the area. As for Very Special Circumstances there are none. Allowing houses to be built is not a good reason because the new plant could be located somewhere else that would have less impact on the surrounding area. It is a mystery why this site was chosen when others were more appropriate. The option of retaining the WWTP at the existing site has not been properly explored. This would surely be much more cost effective and lower in carbon cost and there could still be significant development at the Milton site. There seems to be no ability to compromise.
7.15	<i>"The new plant would be designed to minimise its carbon emissions, through both construction and operation phases"</i> This is an extremely untrue statement. To decommission and decontaminate a functioning plant then build a brand new one over a four year time scale the carbon price will be extremely large. This must be taken seriously in times of concern about global warming. 20% BNG has been quoted without proof. Hard to believe when a million tons of concrete will have been poured onto the site. Increased public access is nonsense. There are currently miles of footpaths in the area which will not be added to by the new plant. The views of an industrial plant the size of Wembley Stadium will not enhance anyone's country walk.
8	SCDC is highly critical of the design of the PD and HPC agrees with all the criticisms presented here. We have already said that the circular bund idea is an alien form in the landscape. Attempting to mitigate the form by planting thickets introduces more alien features into the open landscape. We agree that the landscaping will not hide the industrial large scale structures and that there are many concerns about trees failing to thrive in a dry climate. The concern about soil quality and the inherent problem with planting on a bund because the soil has to be compacted, is also referenced in point 8.31. SCDC emphasise the

	<p>length of time required for the planting to be effective in any way. We fear that this will mean that there will be views of the scarred landscape for many years.</p> <p><i>And point 8.37 'the taller elements of the buildings will still be able to be seen clearly from a majority of the viewpoints'.</i></p> <p>We agree with the criticism of the inappropriateness of a development in the landscape of Honey Hill. HPC believes that the Applicant has underestimated the permanent impact of the development on the area and has argued this is its RR-007. We agree with SCDC that the whole design is generally unsympathetic to the National Character Area.</p> <p>In point 8.45, SCDC questions the whole success of the LERMP as we did in our RR-007 <i>'The District Council considers that the successful implementation of the LERMP [Doc Ref. 5.4.8.14] [AS-066] particularly in relation to planting on the bund may be unsustainable and therefore unsuccessful in the future.'</i></p> <p>HPC would like to comment on any 'alternative measures' that are put forward should the trees fail to grow. In earlier iterations of the design, there was a proposal for a metal fence on the top of the bund and HPC felt that this would definitely not improve the design, it would look like a prison facility. It was one of the few suggestions that was acted upon by the Applicant.</p>
8.6	<p>We are glad that the landscape team at SCDC encouraged the 'rides' but very concerned that the planting is not considered wide enough to achieve mitigation and agree that there needs to be more widespread landscaping on the whole site, not just the around the bund, this view is supported by the National Trust (RR-031).</p>
8.21	<p>We agree with the comments on the ambiguity in presentation of the heights of buildings and too raised this in our RR-007.</p>
8.22	<p>We believe that more viewpoints and receptors should have been included, and these would illustrate the significant impact of the PD in this landscape</p>
8.56	<p>HPC agrees <i>'The District Council considers the approach of the proposed development would conflict with the aim of SCDC Local Plan Policy NH/2 to respect, retain and enhance local character and the distinctiveness of the national character area in which it is located.'</i> SCDC then goes on to qualify this <i>'This is in simple terms because the existing site is an open field'</i>.</p> <p>Most Green Belt consists of open fields. The core site is an open field, but it is part of a much wider landscape in an important piece of Green Belt, enhancing Cambridge city and significant conservation areas.</p> <p>This accords with the view of Historic England REP1-158 <i>'The PD site forms part of the wider setting of the historical assets' and 'views out across the open landscape make a positive contribution to the essential rural character of these conservation areas'</i>.</p>

9 Heritage Asset Overview	<p>In general, SCDC supports our belief that the assessment of harm to the landscape and heritage assets has been underestimated. And in point 9.44 concludes that <i>'The proposed development would not in the District Council's view meet the requirements of SCDC Local Plan Policy NH/14' and the harms have to be weighed against the benefits of the NEC proposals'</i></p> <p>We feel that the proposed development at NEC is a poor one and will be a continuation of what has been called 'the new wall of Cambridge' by Cambridge Past Present and Future CEO James Littlewood, (19//03/2023 Cambridge Independent). There is very little green space and apartments are pressed against the polluted A14. HPC does not believe that the purported benefits outweigh the harms to the Green Belt.</p>
9.41	HPC agrees that the impact on Baits Bite Lock, the River Cam corridor, and Biggin Abbey are at the <i>'higher end of less than substantial harm'</i>
12.20	We support the recommendation for completion of full Ground Investigation Reports
13.6	HPC has raised concerns about odour during the commissioning phase
13.11	The Applicant has not modelled impact of reduced flows in the Cam due to climate change. We agree with SCDC that this could have an impact on odour.
15 Noise & Vibration	In view of the fact that the area is a tranquil one and the plant is operational 24 hours and 33% of HGV activity takes place at night, we do not feel that the Applicant has given the community sufficient information about the potential for noise from operations and SCDC should have a more robust response.
16 Lighting	We disagree with the SCDC's statement at 16.13 that suggests that most lighting will be at 5m. There are many structures that are lit and are above the bund and there are also significant levels of task lighting above 5m that could be used. There is the impact of on/off lighting, and there is not enough information on light spill. The area is dark and tranquil and we feel that this will have a significant impact on the community and on wildlife.
17 Public Health & 18 Community Impact	We do not feel that SCDC have shown concern for the impact of the PD on the health and well being of existing residents and businesses.
19 PRoW	We do not feel that SCDC have shown enough concern about the disruption to PRoW and the views of the landscape that will be blighted for people enjoying the countryside
20 Traffic and Transport	
20.7	We agree that the frequency of 'critical activities' has not been well defined
20.10-20.11	We agree that there will be a cumulative impact resulting from the many building projects taking place in such a small area