

CWWTPR DCO Examination**Submission by Save Honey Hill Group****SHH 38 Response to the Applicant's Comments on Local Impact Reports Document 8.11 [REP2-036]****18 December 2023**

SHH's response refers to reference numbers and topics as specified in the Applicant's Response to LIRs

Applicant's Reference	Topic	SHH Response	References to SHH or Other Submissions
Applicant's Comments on SCDC LIR			
4	Policy	SHH will address local and national policy compliance in a further submission	
8	Landscape	<p>SHH does not agree with the Applicant's assertion in para. 1 that mitigation impacts '...will positively assist the assimilation of the Proposed Development into the area in the short term and provide a very strong foundation in which to allow the landscape planting to mature'.</p> <p>Throughout the Applicants environmental assessments (namely HE and LVA) the benefit of mitigation planting is not anticipated by the Applicant to limit significant harm to the historic environment or visual amenity in the short term, as it defines as up to 12 months after construction (AW 5.2.13 REP1-023 para. 2.4.8).</p> <p>It is not until yr. 15, by its own definition long-term (5-15yrs), that any reduction in harm is anticipated by the Applicant and this is identified as being dependent on the success of the LERMP.</p>	REP1-023
9	4-Historic Environment	SHH notes the Applicant seeks to qualify the differences in assessment of harm to historical assets, namely Baits Bite Lock, HCLA22 and Biggin Abbey on '... different points of view on the extent to which character and setting are already impacted by modern infrastructure (including,	Historic England Managing Significance in

		<p>but not limited to, the A14, overhead pylons and existing activity on and around the B1047 Horningsea Road and A14 junction 34)'. SHH draws the ExA's attention to Historic England's planning guidance, Managing Significance in Decision Making (2015). At para. 28 Historic England specifies that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from the significance of the asset in order to accord with NPPF policies. In this case, the existing intrusion of the A14 and pylons on the historical environment referenced by the Applicant, rather than reducing the significance of impact of the PD, increases the significance of effect. SHH would add the historical asset, Poplar Hall (HE040) to be of relevance here also.</p>	Decision Taking 2015
10	5 Carbon	SHH takes the view that achieving a 70% reduction in carbon emissions from construction should be a requirement, that will need to be monitored, given that this is in line with the Applicant's wider corporate carbon reduction target.	
Applicant's Comments on City Council LIR			
4	Policy	SHH will address local and national policy compliance in a further submission	
7	2 Carbon	SHH takes the view that achieving a 70% reduction in carbon emissions from construction should be a requirement, that will need to be monitored, given that this is in line with the Applicant's wider corporate carbon reduction target.	
9	4 Odour impacts	The Applicant refers to existing vent stacks within Cambridge. It would be useful if the Applicant gave examples of specific locations of comparable height vent stacks to enable the ExA to view them and assess the likely visual and other impacts on residential properties.	

10	5 Land Quality Impacts	The Applicant refers to the Preliminary Risk Assessment Commissioned by Landsec, U+I/Town. It would be helpful if that was made available to the ExA and other parties.	
Applicant’s Comments on CCoC LIR			
2	Agricultural land and soils	SHH has reviewed the Applicant’s response and supports CCoC’s position on the desirability for auger borehole samples of the Waterbeach pipeline, final effluent pipeline, the outfall and waste water transfer tunnel connection to provide a clear basis to ensure that the Applicant’s commitment to proper restoration of agricultural land is achieved.	