

## **Save Honey Hill comments on submissions made at Deadline 4**

This document contains the following responses:

- SHH Response to the SCDC REP3-060 Comments on LIR Responses
- Review of Environmental Statement Chapter 10 Carbon Rev 04 [REP4-027] and Conclusions about Carbon Emissions and Mitigation Proposed
- Response to the draft Design Code 7.17 [REP4-085]
- Comments on Hedgerow Regulations and Tree Preservation Plans 4.8, [REP4-021]
- Response to ES Chapter 13 Historic Environment REP4-030 and Tables [REP4-067]
- Comments on ES Chapter 15 Landscape and Visual Assessment 5.2.15 [REP4-033]
- Responses to the LERMP Rev 03 [REP4-057]
- SHH 58 Comments on [REP4-069] 5.4.19.7 Rev 05 Construction Traffic Management Plan and App. F to [REP4-087]
- Response to Lighting Design Strategy [REP4-048]
- Response to Strategic Whole Life Carbon Assessment 7.5.2 Rev 02 [REP3-042] and to Applicant's Response to Written Representations Section 9 in 8.13 [REP2-037]

## CWWTPR DCO Examination

SHH 48

## Submission by Save Honey Hill Group

**Response to Strategic Whole Life Carbon Assessment 7.5.2 Rev 02 [REP3-042] and to Applicant's Response to Written Representations Section 9 in 8.13 [REP2-037]**

1. The Applicant provided a response in REP3-037 to SHH's Written Representations [SHH-04] in relation to the Strategic Whole Life Carbon Assessment and subsequently amended that assessment in REP3-042.
  - 1.1. The amendments are helpful in clarifying certain of the assumptions made and the reasoning behind them. The conclusion drawn is now more nuanced expressing 'confidence in the overall direction of travel of the findings' that upgrading the WWTP in situ and providing housing in a counterfactual suburban location will result in higher overall carbon emissions than the proposed relocation and development of the core site for housing.
  - 1.2. The calculated emissions, taking what we believe to be the most likely conservative mid-point scenario, as set out on page 13, employing the CHP Option, are 2.0mt CO<sub>2</sub>e for the counterfactual and 1.4mt CO<sub>2</sub>e for proposed relocation and development.
  - 1.3. Despite the Applicant's clarifications, our considered view is that this assessment still overstates the differences in emissions between the two locational scenarios, although we accept that these are still likely to be higher if housing is not provided on the core NEC site and takes place at a location further from the City. We remain of the view that any assessment should only have considered a 5,600 house development on either the core site or the counterfactual site, given that, were the WTPP to remain and be improved on the existing site, the remaining housing development could be accommodated on the other sites at NEC.

**Aspect 1**

2. The carbon assessment in Chapter 10 of the ES has now been updated in REP4-027. The Applicant is unable to demonstrate that the Preferred Option for operation, gas to grid or similar, is feasible. The Preferred Option for construction can be achieved and could deliver further carbon reductions that the Applicant has committed to. The Alternative Design for operation, CHP, is established technology and can be delivered. We accept the Applicant's analysis, which is that, rounded, the relocation will give rise to whole life carbon emissions of c0.1mt CO<sub>2</sub>e. The construction component of these would be avoided if the works were retained and additional carbon reduction measures adopted on site.

**Aspect 2**

3. The Applicant's argument for not making any adjustment for socio demographic differences between the two locations is not accepted. It has to be the case that providing housing at both locations involves accommodating people and households who would otherwise find housing elsewhere. The only difference in emissions between the two locations comes down to embodied carbon of 0.7mt CO<sub>2</sub>e at the preferred NEC location against 0.9mt CO<sub>2</sub>e at the counterfactual Northstowe location. This arises entirely from the assumed difference in average

size of dwellings, 77 sqm GIA at NEC and 100 sqm GIA at Northstowe. There will be more low rise family housing at the latter and, as previously argued, the average size of households is likely to be higher and the age profile lower than at NEC. The difference in emissions per head between the two locations will be less than assessed and they may well, in reality, be the same. We would argue that because of these and other socio-demographic differences, for which there is no reliable data, the conclusion in respect of Aspect 2 is incorrect. The amount of housing consumed by individual households is not, in any event, intended to be influenced by planning decisions about housing location.

### Aspect 3

4. In relation to Aspect 3, we accept that the methodology used is reasonably sound and reasonable average data has been used. Treating the counterfactual as a 'public transport corridor' location, the second lowest rate of emissions after 'urban' is a reasonable assumption, although there will in future be other urban redevelopment opportunities within the built up area of the City, which are as carbon efficient as NEC, but are not assessed. The transport analysis is done on per household averages and again will not be accurate, because it has had to ignore socio-economic and demographic differences between the two locations. Although difficult to prove, we believe that were these other variables included, the transport emissions differences between the two locations would, in reality, be considerably smaller than the 0.4mt CO<sub>2</sub>e actually calculated. We agree that there are likely to be lower transport emissions from occupants of a North East Cambridge development than at the counterfactual location.

### 5. Conclusions

- 5.1. The Applicant now accepts that the comparison made is high level and subject to substantial uncertainties. The assessment of Aspect 2 should not have taken account of the different average dwelling sizes at the two locations, without taking account of the socio-demographic differences between the two locations, particularly differences in household size and age structure.
- 5.2. At best, the analysis suggests that providing the housing that could be built on the core existing WWTP site at a location further away from the City, could give rise to reduced transport emissions sufficient to offset the avoidable carbon emissions from relocating the WWTP. We do **not** agree with the conclusions on page 24 of the report, which is that the relocation 'will lead to **significantly** fewer carbon emissions than expanding and modernising the existing plant in situ and building...elsewhere'.
- 5.3. The ExA, accordingly, should give no weight in the planning balance to the carbon emission differences claimed in this flawed strategic carbon assessment apart from those that relate directly to the relocation of the WWTP.

**CWWTPR DCO Examination****SHH 50****Submission by Save Honey Hill Group****19 February 2024****SHH Response to the SCDC REP3-060 Comments on LIR Responses**

<b>Local Impact Report Paragraph References (REP1-139 superseded by REP4-092)</b>	<b>SHH Response to LIR REP2-066</b>	<b>SCDC Comment REP3-060</b>	<b>SHH Response to SCDC REP3-060</b>
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.	Please see response to Question 2.14 Part (c) – responses to ExA’s Written Question EQ1 [REP2-054].	<p>It remains the case that a feasibility study to identify the quantum of housing and employment that could be attained on the North East Cambridge site, while retaining the WWTP on site as specified in the SCDC Local Plan (2018) at para 3.29, has not been undertaken.</p> <p>SCDC response to ExQ1 2.14 Part (c) demonstrates having secured HIF funding that required commitment to a quantum of high density housing, the Councils from then on excluded any consideration that would not fulfil that housing requirement.</p> <p>The Cambridge Northern Fringe (CNFE) Issues and Options Report (2014) that informed the existing Local Plans (SCDC 2018; CCC 2018) is the only document known by SHH to be available to the ExA that presents potential development scenarios</p>

			<p>at North East Cambridge without relocation or consolidation of the WWTP.</p> <p>As referenced by SHH (REP2-066) the scenarios in the CNFE issues and Options Report (2014) relate to the original 'Northern Fringe' to the east of Milton Road and have not factored in the greater development potential of the wider site adopted in NECAAP to the west of Milton Road including the Cambridge Science Park. It is reasonable to suppose the larger area would provide additional development potential.</p> <p>Informed by the CNFE Issues and Options Report (2014) SCDC current Local Plan (2018) Policy SS/4 (2) specifies allocations at North East Cambridge 'for high quality mixed-use development, primarily for employment within Use Classes B1, B2 and B8 as well as a range of supporting uses, commercial, retail, leisure and residential uses (subject to acceptable environmental conditions)'.</p> <p>SHH in its representations (e.g. REP2-066 see 6.33 below) has referenced Option 2, of the CNFE Issues and Options Report that identifies the potential of 15,000 jobs and a small quantum of housing without relocation or consolidation of the WWTP.</p> <p>The revised LIR REP4-092 para 6.35 identifies the potential of circa 1425 homes without a relocation or consolidation of the WWTP.</p>
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			<p>As SHH has submitted in REP2-066 at 6.3, the very high demand for employment space including redevelopment of existing commercial buildings both to the west and east of Milton Road is evident in current planning applications.</p> <p>The Vitrum Building 23/01509/FUL has been granted planning permission since SHH's submission.</p>
6.33	<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 &amp; 37. 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. SHH also notes and has responded to the SCDC ExQ1 Response 7.35 in SHH18</p>	<p>The reference to the 2014 Issues and Options report pre-dates the NECAAP Transport Study ii, which highlights the fact that the surrounding road network is at capacity and recommends the use of a trip budget as the only sustainable means by which to enable any further development within the NEC area to come forward. The transport evidence is clear that employment uses are the significant contributor to trip generation. This is reflected in the level of employment floorspace provided for through the proposed NECAAP. However, even these levels of employment uplift for the eastern side of Milton Road are contingent upon the reduction in trips from redevelopment of the western side of Milton Road. Without relocation of the CWWTP the development quantum to be achieved east of Milton Road is unlikely to fund the substantial cost of the sustainable transport interventions required to</p>	<p>SHH recognises the constraints the Trip Budget at the Milton interchange places on development potential at North East Cambridge.</p> <p>SHH referenced the Trip Budget in REP2-066 at 7.14 with regard to the ability of NECAAP to deliver market appropriate housing and that transport modelling might well demonstrate that there is insufficient transport capacity, as reported in The North East Cambridge Core Site Update (2023), which could as yet render NECAAP in its present form unsound.</p> <p><a href="#">North East Cambridge Core Site Update Report 2023</a> Section 6.0 Key Risks</p> <p>The existence of this 'maximum trip budget' does present particular challenges in taking NECAAP forward, since it will involve constant trade-offs between different sites and types of development, which will be the subject of continuing disputes with and between individual landowners within NECAAP over the allocation of components of that overall trip budget and over the financial and in</p>

		<p>facilitate the transfer of existing trips from the Science Park. Without this, the development capacity east of Milton Road will likely remain very limited. Further, if the CWWTP was to remain in situ, it will not provide the high quality environment needed to support a higher quantum of commercial floorspace.</p>	<p>kind contributions they need to make to transport initiatives.</p> <p>At this stage it is just not clearly known what the nature or cost of the sustainable transport interventions needed across NECAAP will be nor whether the ‘trading of trip capacity’ between the land to east and west of Milton Road is the best solution or acceptable to the owners of the Science Park or any other landowners outside the core WWTP site.</p> <p>This remains a substantial uncertainty about the soundness of NECAAP, which has yet to be examined.</p> <p>SHH’s position generally is that redevelopment of land at NECAAP is going to yield high net capital values, whether development is for high quality employment uses or housing. Both will be capable of funding the necessary sustainable transport initiatives as well as the other relevant infrastructure and community services required.</p> <p>In addition to contributions from developers, the joint Councils have access to substantial grants to enable sustainable transport solutions as a key component of the Cambridge City Deal <a href="#">Cambridge City Deal Gov.Uk 2014</a></p> <p>SHH understands Greater Cambridge Partnership has been successful to-date in being awarded each tranche of funding available to it. It is understood</p>
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			<p>that a further £200 million will be available from April 2025 to 2030. <a href="#">Smarter Cambridge Transport - Cambridge City Deal</a>;</p> <p>In relation to the last sentence of SCDC response regarding ‘high quality environment’, whilst the odour zone may limit some aspects of development, it is not a case of ‘all or nothing’.</p> <p>Commercial buildings providing for high quality R&amp;D and general office space already exist within the odour zone of the WWTP and further schemes are being proposed within this area to meet market demand, without any guarantee that the WWTP relocation is going ahead.</p> <p>SHH draws the ExA’s attention to the example of two recent planning applications: 23/01509/FUL and 23/01878/FUL.</p> <p>Both of these proposals involve redevelopment of existing commercial buildings to provide high quality employment space. The first, The Vitrum Building is for R&amp;D development and is within 50m of the boundary of the WWTP. Permission was granted in November 2023 (23/01509/FUL and counterpart) for 17,000 sqm GIA. The second application 23/01878/FUL is directly on the boundary of the WWTP and seeks to increase office provision and is awaiting decision.</p>
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			<p>As the ExA is already aware, the Brookgate application, still under appeal, proposes some 53,000 sqm of high quality R &amp; D/office space.</p> <p>SHH also notes the Up-dated GCP Development Strategy (2023) which identifies at para 2.11 <i>the industrial and warehousing space may need further provision which should include a combination of traditional industrial units with wholesaling / servicing, manufacturing, mid-tech units and more warehouse and distribution focused units.</i></p> <p><a href="#">GCP Development Strategy Up-date 2023</a></p>
6.73	<p>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.</p>	<p>It is important to read paragraph 6.73 of the LIR [<b>REP2-052</b>] together with paragraphs 6.74 to 6.77. Paragraph 6.74 in particular states <i>“However, what we do understand already is that once the reservoir is operational from around the mid-2030s there will be substantial water supply available. The process for bringing forward the new Fens Reservoir is already progressing and given the significance of the proposal to the future water security of the Region, there is considered to be a reasonable prospect that it will be delivered and therefore we can be confident that whatever decision is made for the plan period as a whole, we will be able to plan for further development being completed from the opening of the reservoir in 2035-37. It</i></p>	<p>It remains the case that there remains uncertainty around the deliverability of the GCLP, particularly the extent to which new sites (i.e. those not already proceeding under the existing local plans), will have to be restricted from delivering housing prior to the last few years of the emerging plan period. This limitation will apply to the majority of the 3900 homes proposed at North East Cambridge in the local plan period to 2041.</p>

		<p><i>is the interim period that remains uncertain at this point, although it is expected that the proposed water transfer measures will increase supply from around 2032.”</i> Further the Development Strategy Update <b>[Appendix 1 GCSP - 38 &amp; GCSP- 39 of the SCDC LIR [REP2-052]</b> confirms NEC as one of 3 key sites for form part of any development strategy for the new local plan, subject to the outcome of the DCO process.</p>	
<p>6.79-6.81</p>	<p>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. As examples, the proposed new strategic site of Cambridge Airport (capacity 7,000 homes) and existing new</p>	<p>SCDC LIR <b>[REP2-052]</b> explains the delivery rates that are considered realistic to inform the housing trajectory (see paragraphs 6.84 to 6.89). These are higher than has been assumed in the adopted 2018 Local Plans where 250 dwellings per annum was the accepted average rate. There is no evidence to support the claim of 5000 homes at the Cambridge Biomedical Campus as part of the new Local Plan as noted previously in the Council’s response to the Save Honey Hill Written Representations para P.65 <b>[REP2-051]</b>. The Housing Delivery <b>Study [Appendix 1 GCSP28 &amp; GCSP29 of the SCDC LIR [REP2-052]</b> recommends increasing the average annual figures to 350 for sites within or on the edge of Cambridge having regard to actual delivery rates in the</p>	<p>SHH's overall position on housing delivery and alternatives is robust and considered: it is just following a different but entirely sound longer term vision for future development in and around Cambridge from that being defended by SCDC. It would involve, if necessary, speeding up delivery from existing allocated major development sites, although the December 2023 NPPF has changed the rules regarding housing need and the requirement to include a 10% buffer in local plan housing allocations.</p> <p>SHH has responded and accepted the intention for Cambridge Bio-Medical Campus (CBC) is much lower than the figure of 5,000 homes as presented in GCLP FP DS pg 129. SHH 33 REP2-068 (Note SHH33 follows SHH34 in REP2-068).</p> <p>However, in forming 1 of the 3 key sites to form part of any development strategy for the new local plan (GCP DSU 2023), it remains the case that</p>

	<p>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. 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. 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 e.g. to the south and east of Cambridge as well as active dispersal of growth into the market towns around Cambridge.</p>	<p>area, but to assume faster delivery and much higher delivery figures within the plan period on other strategic sites instead of delivery at NEC would be inconsistent with the evidence and place the Councils (SCDC and the City Council) at significant risk that the plan would be found unsound and that housing needs would not be met. The position remains that NEC is the most sustainable location in Greater Cambridge to meet needs for jobs and homes and should come forward for development, subject to the DCO being granted.</p>	<p>some housing provision can be expected to come forward from CBC.</p> <p>SHH has responded to SCDC LIR (REP2-052) comments on Housing Delivery Figures and Alternative Sites to North East Cambridge (NEC) incorporating the up-dated housing figures without the relocation of the WWTP. SHH refers the ExA to SHH response ref p66-67, Topic 6.6.1 to 6.6.4 Alternatives to NECAAP SHH 33 REP2-068 (Note SHH33 follows SHH34 in REP2-068).</p> <p>It remains the case, and this has not been disputed, there is sufficient capacity amongst new and existing strategic sites in the GCLP FP to accommodate the number of homes allocated for build out at NEC beyond the GCLP period post 2041 without the requirement for a new strategic site or development in the Green Belt above that which is already proposed or planned.</p> <p>What is disputed is the number of homes that could be reallocated amongst the sites from NEC for build out within the GCLP plan period to 2041.</p> <p>Taking into account the revised number of homes that could be built at NEC without a relocation of the WWTP of 1,425, the balance of homes that would require reallocation to meet the GCLP FP housing requirement would be 2,475.</p>
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			<p>The up-dated NPPF (Dec 2023) has removed the requirement for Local Plans to include a 10% buffer above OAN in their housing allocations and trajectories. This alone reduces the number of homes required and currently allocated in the GCLP FP by 4,440 homes.</p> <p>As an alternative to NECAAP, if the DCO is not granted, it is clear the removal of 4,440 homes from the housing requirement to 2041 in the GCLP FP, would at a stroke remove the need for any redistribution of the current housing allocation at NEC.</p> <p>It remains SHH view, as detailed in SHH 33 REP2-068 that a re-distribution of at least some of the homes amongst new and existing sites intended for North East Cambridge in the GCLP plan period is also a realistic alternative.</p> <p>Within the limits of the number of homes identified as sustainable and deliverable in Greater Cambridge in the GCLP plan period, any ‘surplus’ allocations remaining could contribute to the delivery requirements identified in the Up-dated GCP Development Strategy (2023) <a href="#">GCP Development Strategy Up-date 2023</a></p> <p>SHH has commented on SCDC’s assertion that NEC is the most sustainable location to meet needs for jobs and homes in the context of transport and carbon emissions. This position is amplified in the SHH Response to the Revised Strategic Carbon</p>
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			Assessment in SHH 48, which indicates that any transport carbon advantage that NEC offers is relatively small set into the context that, within and around Cambridge, over 40,000 homes have to be provided on sites which are sustainable in transport and other terms for the period to 2041 and that a similar number will be required over the ensuing 20 years, involving yet further strategic land allocations in locations yet to be considered.
6.111 and 6.112	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.	SCDC does not agree this assumption can be made and would direct the ExA to the Proposed Submission NECAAP [Appendix 1 GCSP7] and the spatial framework supporting the development quantum proposed in the NECAAP and emerging GCLP 35 Appendix 1GCSP- 6 of the SCDC LIR [REP2-052]. This was [which a] predicated on the relocation of the WWTP taking place. With respect to the quantum of employment floorspace that could be supported, please see the response to paragraph 6.33 above.	Please see response at 6.33 above. SHH’s position on this point remains unchanged.
6.112	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. 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	It is relevant to note that there is already a housing supply of 37,200 dwellings as a result of the current 2018 Local Plans allocations and planning permissions (GCLP First Proposals, Policy S/DS, table on page 32). The balance that needs to be found in the First Proposals on additional sites or through	The balance of 11,596 dwellings identified as being required in the GCLP FP in addition to those already in plan includes 4,440 homes as a 10% buffer <a href="#">GCLP First Proposals 2021</a> (see pg 30)  As above, the updated NPPF no longer requires local plans to include a 10% buffer in their housing calculations.

	<p>requirement agreed and identified as deliverable in Greater Cambridge. 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>	<p>densification is 11,596 dwellings. The 3,900 dwellings at NEC is therefore 33.6% of the additional housing being provided through the GCLP First Proposals. With respect to the rate of housing delivery please see the Council’s response to Paragraphs 6.79 – 6.81.</p>	<p>Consequently, the GCLP FP has surplus allocations and does not need the 3,900 homes allocated at NEC to meet the housing requirement of the First Proposals.</p> <p>Taking into account the revised number of homes that could be built at NEC without a relocation of the WWTP of 1,425 (REP4-092) and excluding those dependent on a relocation of the WWTP, a remaining surplus of 1,965 homes provided for in the First Proposals would still be available to contribute towards the updated housing requirement identified in the Development Strategy Up-date (2023) as a result of the removal of the 10% buffer incorporated in the GCLP FP.</p>
<p>6.115</p>	<p>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.</p>	<p>SCDC would refer to the full wording in paragraph 6.115 of its LIR [REP2-052]] which provides the fuller nature of the mixed development proposed for the area, SCDC does not agree SHH assumption that the level and quality of the commercial floorspace proposed by the NECAAP could still be achieved without relocation of the WWTP. Please see the response to paragraph 6.33 above which further explains why SHH’s assumption is not well founded.</p>	<p>SHH notes the longer quotation from the LIR, but this does not affect the substance of SHH’s evidence, summarised in the response to para 6.33 above. Major landowners and developers with good knowledge of the market do not invest in securing large scale planning permissions for high quality life sciences or other R &amp; D activities, where they do not believe that it is commercially viable in the present market. These developers are confident that their schemes can and will be built without the relocation of the WWTP. In the case of sites on the St John’s Innovation Park, such as Vitrum and the Dirac building, the planning authorities have not challenged the suitability of the proposals and these have permission to go ahead, even if the WWTP remains in situ.</p>

CWWTPR DCO Examination

SHH 52

Submission by Save Honey Hill Group

19 February 2024

**Review of Environmental Statement Chapter 10 Carbon Rev 04 [REP4-027] and Conclusions about Carbon Emissions and Mitigation Proposed**

**1. Introduction**

1.1. This review considers the Environmental Statement Chapter 10 5.2.10 Rev 04 [REP4-027], the Calculations Appendix [REP4-063] and notes the construction carbon reduction commitment now incorporated in the Design Code [REP4-085]. We have also noted the questions asked by the ExA in ExQ2 at Q6.1 to 6.13.

**2. Carbon Assessment Methodology and Assumptions**

2.1. This updated version of ES Chapter 10 is far clearer and better presented than earlier iterations. It now sets out the relevant baselines, has renamed the options assessed and reports the assessment against those baselines.

2.2. Having reviewed the calculations, SHH is satisfied that the quantitative estimates have followed a generally appropriate methodology and, insofar as they can be checked, are arithmetically correct.

2.3. The Applicant continues to describe the biomethane gas to grid option as the Preferred Option, but, as set out in SHH's Written Representations SHH 04 REP1-171 at p 85, it may be technically feasible, but with the great uncertainties that exist in relation to the future nature of the gas grid, including decarbonisation, and the commercial viability of exporting gas to the grid, the Applicant is unable to commit to this or any other biomethane export option. The Alternative Design uses established CHP technology and has the benefit of a stable market for electricity. The ExA should only be drawing conclusions about environmental impact in relation to this option and the extent to which it can achieve reduced construction carbon emissions and operational net zero.

2.4. There are still some errors and lack of clarity in the assessment in REP4-027, some of which the ExA has identified in ExQ2. These should be addressed in a further revision of the ES chapter. SHH has noted five of these:

- (i) A most surprising result from the published assessment is the comparison now provided of the operational carbon emissions, in Table 4.6, for the existing WWTP and for the comparable Alternative Design i.e. the CHP option. This states that the operational emissions from the existing WWTP, at 0.016 net tCO<sub>2</sub>e per megalitre, using 2028 emissions factors, performs better than the Alternative Design for the new works, at 0.018 net tCO<sub>2</sub>e per megalitre. This requires an explanation from the Applicant as to why an entirely new design with state of the art plant is unable to better the performance of

the existing works. We had also always understood that there was scope for further improvements to the carbon performance of the existing works, particularly if it was consolidated and extended on site, but this information suggests otherwise.

- (ii) Table 2.2 has had the construction carbon data sources removed, without any others being put in their place and this should be corrected.
- (iii) SHH continues to take the view that the carbon emissions from demolition of the existing works (and the Waterbeach works) should have been included in the construction carbon estimates, but accept that these are likely to be less than 5,000 tCO<sub>2</sub>e. Both the construction and operation of the new Waterbeach pumping station should also have been included in the assessment and the explanation in para 2.7.2 that these are not under the Applicant's control is incorrect. The explanation given in para 2.7.4 as to why sludge transport has been excluded is noted. However, since sludge transport from satellite works and subsequent processing is an integral part of the operation of the new works, the net carbon emissions from that transport should have been included. SHH is unable to quantify these missing impacts, but accepts that they will be a relatively small part of the gross and net whole life emissions.
- (iv) Although not as clearly expressed as it should be in ES chapter, it is our understanding that the assessment of construction carbon and the 45% reduction to 53,000tCO<sub>2</sub>e reported for the DCO Design has been assessed based on the CHP Option. It has then been assumed that the construction emissions for the Preferred Option, biomethane gas to grid will be the same. In our view, this is a not unreasonable construction assumption and the best that the Applicant can do given the uncertainties and lack of a specific design for gas to grid. The text of the chapter should be amended to set this out clearly.
- (v) The reporting of significant impacts and effects in Tables 4.7, 4.8 and 4.11 remains confusing. Tables 4.7 and 4.11 report what should be labelled significant impacts (not effects) since they are impacts before secondary mitigation. Table 4.7 reports the impacts of the CHP net emissions as **moderate adverse, significant**, which is carried forward into Table 4.11 for the whole life significant impacts, before secondary mitigation. The text at paras 4.6.14 to 16 describes these. Para 4.6.17, under the heading residual effects then states that the whole life 'residual effect' after secondary mitigation, remains 'the same as in Table 4.11' rather than including a final Table 4.12 setting these out. This means that Table 4.8 reports the residual effects of the CHP Options, both gross and net, as 'negligible, not significant' while Table 4.11, read with para 4.6.17, which purports to report the whole life residual effects, leaves these effects as '**moderate adverse, significant**'. The Applicant should be asked to confirm whether that is their final judgement. SHH believes that the whole life net carbon emissions of the Proposed Development should be described as a 'significant adverse environmental effect', even when mitigated as far as practicable.

### 3. Carbon Assessment Findings

#### Construction Carbon

- 3.1. Table 4.8 reports the whole life gross and net carbon emissions for the Alternative DCO CHP Design as 101,480 tCO<sub>2</sub>e gross and 89,540 tCO<sub>2</sub>e net. The Preferred Option Gas to Grid net



emissions are reported as better than carbon neutral at -16,870 tCO<sub>2</sub>e. For the reasons set out in Section 2.4 (iii) above, these results would be higher ie worse, if the missing elements of the analysis are added in. More importantly, because the Applicant is unable to confirm that the Preferred Option is technically or commercially feasible, initially or over the long term, this finding and the accompanying significance rating has to be ignored in drawing conclusions about carbon.

- 3.2. Given the revelation set out in 2.4(i), that the existing works is already more carbon efficient in operation than the proposed works, SHH is unable to judge what scope there would be to make the existing/expanded works net zero. Elsewhere SHH estimated and the Applicant agreed that retaining and expanding the existing works on site would entail a construction carbon budget of around 17,000 tCO<sub>2</sub>e, that is 34,000 tCO<sub>2</sub>e lower than the DCO CHP Design.
- 3.3. SHH believes that the whole life net carbon emissions of the Proposed Development should be described as a 'significant adverse environmental effect', even when mitigated as far as practicable. This conclusion needs to be given considerable weight in the planning balance.

#### **4. Setting and Securing Carbon Reduction Commitments**

- 4.1. The Applicant has now confirmed that the total carbon construction emissions of the DCO Design as it stands is 53,010 tCO<sub>2</sub>e, a claimed 45% reduction on the DM0 Design. The Applicant has set out briefly in the carbon section of the Design Code [REP4-085] how it is making a commitment to reduce those emissions further to a -55% reduction to 43,540 tCO<sub>2</sub>e with an aspiration to go further to achieve the Applicant's stated corporate commitment of a -70% reduction.
- 4.2. The binding carbon target can only be delivered by arrangements which break down and cascade the overall target through each of the stages of detailed design, procurement and, on the ground, to the construction contractors.
- 4.3. It is difficult to judge whether the 55% reduction target is reasonable, since we do not have access to the detailed assumptions being made as to the potential sources of further reductions or how these will be imposed through the Applicant's supply chain. Based on other projects at this stage of design, a further 20% or so reduction, to 34,800 tCO<sub>2</sub>e is likely to be achievable. The Applicant's own corporate -70% reduction target may not be.
- 4.4. SHH would prefer that these arrangements were captured in a Design and Construction Carbon Management Plan and a separate DCO Requirement, alongside Requirement 21, dealing with operational carbon. Further comments on this are set out in SHH 53 Response to the draft Design Code [REP4-085].

#### **Operational Carbon**

- 4.5. The Applicant has already committed to securing net zero during operations, as set out in Requirement 21 in REP4-004 and the Outline Carbon Management Plan REP4-065. SHH has already made the case in SHH 40, REP4-106, that Requirement 21 should be tightened to make

sure that operational net zero is delivered on site and covers all operations based from the site, without the use of offsets, such as carbon credits or off site sequestration arrangements. The OCMP in Section 4 seeks to rely on a 'hierarchy of offsets' including those to be achieved through, for example, the supply of goods and services by third parties. We believe that these off site measures are very difficult to measure or verify and should not be relied on.

- 4.6. Solar PV power is the most obvious route to finally delivering operational net zero on site. Para 3.4.5 of the OCMP suggests that based on the present assessments, this would require up to 5.6MWp of installed solar panels. This would involve solar panels covering the whole inward south east to south west facing segment of the earth bank, but also a substantial area, maybe 2ha, of surfaces within the plant footprint. This is a considerable extent of solar provision which has not been considered in any detail in the design to date and there will be visual and other impacts of this solar array, including fencing etc, to be considered by the relevant planning authority before installation is approved.
- 4.7. In SHH's view, this approval process needs to be expressly referred to in the Requirements, for example, as a single defined phase of development for the purposes of Requirement 7. The detailed Carbon Management Plan in Requirement 21 is not the appropriate vehicle for this approval, since that plan only has to be submitted and approved prior to operation of the gas recovery plant. The delivery of solar power needs to be considered much earlier in the design process and delivered as part of the main works construction.

**Submission by Save Honey Hill Group**

**19 February 2024**

**Response to the draft Design Code 7.17 [REP4-085]**

**1. Introduction**

- 1.1. SHH made a request in para 8.6 of its original Relevant Representations RR-035, that the reference in what was Requirement 7(2) of the dDCO to ‘the details submitted must accord with the design objectives set out in section 11 of the Design and Access Statement’ was insufficient in that those principles or objectives were very general. They may have been helpful during the pre-application stages of design, but many are now redundant. Few are sufficiently clear or precise to provide minimum standards or guidance for design development and approvals after the grant of the DCO. We suggested these refined standards should be called ‘Design Requirements’ but are prepared to accept the name ‘Design Code’. We also asked for up to date ‘benchmark’ designs to be referred to as part of those standards.
- 1.2. The Applicant has belatedly addressed this matter by amending what is now Requirement 7(3) of the dDCO Rev 06 at D3 to require ‘the details submitted must accord with the Design Code’. A draft Design Code REP4-085 has now been produced at D4.
- 1.3. In ExQ2, the ExA has raised a number of concerns about the Design Code, which, among other things, is an early draft which has not been proof-read or checked by the Applicant’s design, planning or technical teams as representing an up to date view of the design in the light of submissions made to the Examination.
- 1.4. The Applicant has chosen to set out two matters in the Design Code which we believe would be better addressed elsewhere:
  - (i) The construction carbon reduction target and the means by which this will be delivered. In our view, since these were not issues addressed in the Design and Access Statement. These would be better set out in a free-standing Design and Construction Carbon Management Plan and made the subject of a new Requirement.
  - (ii) The minimum height and other parameters for the circular earthwork, which should be in Schedule 14 to the dDCO.
- 1.5. SHH has substantial concerns about this Design Code, as drafted, in terms of its scope, style and content which are set out in the remainder of this response. We believe that these concerns will be widely shared by the local planning authorities and other stakeholders. It will require rethinking and redrafting to make it fit for purpose.

## 2. Response to Sections 1 and 2 of the draft Design Code

- 2.1. Sections 1 and 2 of the draft Design Code are a confused summary of the purpose, scope and application of a Design Code, which has to be part of a coherent set of DCO documents that will guide the detailed design and delivery of the Proposed Development. The text of the draft has not been updated to take account of changes in the dDCO, in Requirements, for example, made in Rev 07.
- 2.2. The purposes should be clearly stated in the introduction as being to:
  - (i) Set out minimum design requirements, standards and guidance for use of the Applicant's design teams and contractors at detailed design, for further approvals and delivery of the DCO, alongside the other DCO documents, drawing on the Design and Access Statement.
  - (ii) Provide clear guidance for the relevant planning authority, other discharging authorities and stakeholders, when considering whether design submissions should be acceptable under the DCO.
- 2.3 The purposes set out at paras 2.2.6 to 2.2.9 of the draft should be brought to the front and edited.
- 2.4 The DCO, if made, will formally comprise the DCO itself, including the matters defined in the schedules (including the Requirements and the Parameters), the Works, Land and other submitted design plans and all of the management plans which are listed to be certified by the Secretary of State. There are also design assumptions and mitigation requirements which are embedded in the Environmental Statement or included in the mitigation schedules, all of which will have to be met. The Design Code should not be seeking to repeat requirements or parameters, nor can it override these provisions.
- 2.5 The Applicant stated at ISH3 that the Design Code was not intended to deal with landscape, ecology or recreation matters, since these are dealt with at length in the LERMP, which is to be a certified document and is covered separately in the Requirements. The LERMP still needs a final updating to address points SHH has made in SHH 57 Response to the LERMP Rev 03, to include up to date masterplan drawings and sections. Anything set out in the Design Code in relation to landscaping and planting needs to be consistent with the LERMP.
- 2.6 The focus of the Design Code should be on the permanent built components of the proposed development, essentially the 'buildings' and other plant and structures within and including the circular earthwork, parking and external hard landscape around buildings, the access road and highway works. It should also cover any other permanent above ground structures outside the core site. These are the outfall, the interception shaft on the existing works site and any inspection/maintenance chambers and vent shafts on the pipelines and tunnel.
- 2.7 The Design and Access Statement contains valuable design analysis and in places sets out developed designs for buildings such as the Gateway and Workshop Buildings. The DAS, even if not a certified part of the Order, will still exist and should inform the next stages of design. The

Design Code should still refer to particular parts of the DAS, where these remain valid.

- 2.8 Para 2.2.5 needs to state that the Tables 2-1 and 2-2, labelled Design Principle and Design Objectives, are those used in pre-application design and are copied from the Design and Access Statement. It needs to be clear to what extent they remain relevant to this Design Code. The statement in para 2.4.2 should reference compliance with the Design Code, drawing on the earlier Design Principles and Design Objectives, rather than as drafted.
- 2.9 Section 2.5 refers to Design Review. As the ExA has noted in ExQ2, the role, standing and powers of any client Design Champion needs to be clearly set out. It would also be helpful if the Applicant's commitment to seek external design advice during detailed design of the buildings from the Cambridgeshire Quality Panel is set out here. The LERMP introduces the concept of an Advisory Group to advise during design and delivery of the landscape etc works. If the Applicant intends to consult other Technical Working Groups during detailed design, this should be referred to.
- 2.10 It would also help understanding of the Design Code, if the Applicant summarised the intended Design and Procurement Strategy and Programme for the project going forward, including how design will be integrated and managed and the staged progression of design and a broad division of the design and build/supply contracts. This is particularly relevant to securing the carbon commitments but more generally helpful to the planning authorities and other stakeholders.

### **3. Response to Section 3 of the draft Design Code**

The title Design Codes is clumsy and unhelpful. Design Components or Detailed Design Guidance would be better. Our response has been ordered according to the sub-headings in the draft, but these headings and ordering should be reviewed in the light of those comments. Where Figures from the DAS are reproduced in the Design Code, they require proper explanation and labelling.

#### **3.1 Site layout**

LAY.01 is very general. Figure 3.1 which summarises the functional layout strategy is important. There also needs to be stress on the importance of considering the 'massing' or 'grouping' of taller plant, in terms of external visual impact of the ensemble. SHH has asked that the powers in Article 6 of the dDCO to deviate the location of plant within the circular footprint be reduced and the plans corrected. The Design Code should note the intentions to reduce the height and bulk of larger plant structures are far as practicable below the maxima set out in parameters. Change LAY.05 accordingly.

LAY.02 to LAY.04 are too general and need to contain specific advice. If the Applicant intends to reduce the extent of parking, this should be set out here. The parking area should be screened and broken up by tree and shrub planting. Any design requirements for highway works should be added here eg minimise provision of tall lighting columns on Horningsea Road.

Figure 3.3, which reproduces an image from page 96 of the DAS, has no text there or no labelling in the draft Design Code explaining its meaning, unless intended to relate to section 3.2 on colour, commented on below.

### 3.2 Use of colour

COL.01: The words 'as far as reasonably practicable...etc' should be deleted since this caveat applies to all design guidance in this document. Further testing and work is needed to develop the 'colour strategy' set out in Section 7 of the DAS. All buildings and structures above around 6m above FFL will be visible from outside the earth bank, except to observers very close to the bank, under winter conditions, because of the sparsity of the screening as set out in SHH evidence. Buildings and structures extending above this level (not the 12m noted in Figure 3.3) should have progressively lighter grey colours applied. As design develops, these colour visualisations need to be repeated, taking account of positioning and mass of structures and the practicality of applying light colours to certain structures and materials. These need to be shared with the relevant planning authority and stakeholders.

COL.02: A winter colour palette is appropriate for structures visible above the earthworks. Reference should also be made to avoiding highly reflective finishes on plant, flues etc where these surfaces will glint and reflect visibly where viewed from outside the works.

COL.03: Should say 'provided' not 'permitting'.

Figure 3.4 needs to have labels to make sense.

### 3.3 Materials

MAT.01: is inoffensive. This section should contain specific guidance on hard landscape and access road/parking materials, or it should appear under 'landscape'.

MAT.02: Already dealt with under colour.

MAT.03: The use of a 'natural materials' approach, that reflects the landscape of south and east Cambridgeshire is commendable, but challenging given there is no locally occurring building stone to provide a dark plinth. Timber cladding will present real challenges to maintain colour and durability. Quality and colour may need to take precedence over local sourcing.

MAT.04: Should refer to the colour guidance in Section 3.2

MAT.05: Unnecessary glazing would run counter to the aesthetic approach chosen. Glazing provision is relevant to the external public faces of the Gateway building and should be dealt with under 3.5 Gateway building design.

### 3.4 Building performance

PER.02: Reference to net zero should be to operational carbon emissions.

### 3.5 Gateway building design

Note the mistake in the heading to this section. As SHH argues in SHH 51, Responses to ExQ2,

the office floorspace being provided in the illustrative designs and parameters is unnecessarily large and the building should be reduced in scale, probably by reducing the length.

GBD.01: The slight offset to the orientation will not readily be visible in longer views, only on plan. Not necessary to state an exact offset.

GBD.03: In the illustrative designs, this is only carried through on the external public facades and is of less importance on the works facing façade.

GBD.05: Minimising solar gain through shading and other means is desirable, but can be achieved in several ways. The use of a large overhanging roof as in the illustrative design needs to be tested further in detailed design and may not be the best solution.

GBD.06: Coverage of a large proportion of the roof with solar PV makes provision of a green or brown roof unnecessary and of little benefit, so should only be specified if solar PV is not to be installed.

GBD.07: Operational separation of offices and Discovery Centre is obvious. Discovery Centre should be on first floor.

GBD.08: Should refer to building plant, including solar PV panels.

### **3.6 Workshop building design.**

WBD.03: Given the orientation, it may not be feasible to have high level clerestory glazing on the southern facade.

WBD.04: Should refer to building plant, including solar PV.

### **3.7 Carbon**

In order that the Applicant can achieve the construction carbon reduction commitments, these have to be delivered progressively at each successive stage of design, 'planning' approval of designs, procurement, final detailed design and construction, with appropriate monitoring and reporting. These are now established practice on major infrastructure and development projects. As part of design integration, a comprehensive carbon model has to be used to test design and materials options, record carbon reduction decisions and provide for internal and external reporting of how targets are being achieved.

SHH has responded to the carbon assessments set out in Chapter 10 of the ES [REP4-027] in SHH 52. CAR.01 reports the construction carbon emissions calculated for the CHP Design (which has also been assumed to be the same for the Gas to Grid Preferred Option). The Applicant needs to confirm that this commitment stands, whichever final design is adopted. The Applicant needs to confirm the scope of the emissions included in the assessments, in particular whether all of the enabling works, the main engineering, building and landscape works, construction activities and the Waterbeach pipeline works are all included in scope.

SHH has asked for the committed reduction target in CAR.01, where the Applicant has offered 55%, should be made tighter, as a further 20% reduction on the DCO Design (ie to 34,800tCO<sub>2</sub>e). The drafting of CAR.01 and CAR.02 needs to be made consistent. At present CAR.01 refers to 'footprint', while CAR.02 refers to 'design'. CAR.02 needs to state the 70%

target, brought forward from CAR.09, and the commitment to trying to meet it, whether ‘best endeavours’ or otherwise.

The Applicant already has a Procurement Strategy and Design Programme in place, although not a DCO document. These targets will need to be disaggregated to reflect the remaining stages of design and construction to reflect the intended division of procurement and delivery of works into separate contracts. While it is clearly a matter for the Applicant as to how internal reporting of carbon target achievement is undertaken, CAR.10 needs to be brought forward in the list and set out the staged consultation and reporting to key external stakeholders, in particular, the relevant planning authority. As the ExA has noted, PINS is not one of those stakeholders.

SHH’s preferred approach to this is:

- (i) A Design and Construction Carbon Management Plan to be submitted now, to include a breakdown of the targets by contract or workstream, with an appropriate Requirement setting out the subsequent stages of carbon reduction, approval, reporting and delivery.
- (ii) At a minimum, there should be reporting of the overall total construction carbon emissions that are now being achieved and specific results for each contract/workstream at the following milestones: three months before commencement of enabling works; on submission of the phasing programme under Requirement 3; with each submission for approval made under Requirement 7 and Requirement 11; at the approval of detailed design for each construction or large scale plant contract and at 6 month intervals following commencement of each of those contracts. On other projects, this has been rationalised against the programme to avoid unnecessary repetition adopting a quarterly reporting frame.

CAR.03 to CAR.08 all contain relevant ideas as to how carbon reduction should be pursued but is confusing in its drafting and not comprehensive. These would be better presented by topic , for example, engineering/building design, materials including recycling/waste minimisation, plant and machinery fabricated off-site, construction transport and plant emissions.

### **3.8 Landscape and ecology**

SHH and SCDC have expressed various concerns about the landscape and planting design as set out in Section 8 of the DAS and in the LERMP and these should be addressed in the Design Code.

LAN.01: There are virtually no trees or hedgerows that are to be retained except on the southern and western boundaries. This prescription should be reviewed. Translocating poor quality hedges is unlikely to be worthwhile. Early stage planting of trees and hedges should be more extensive along the northern boundary of the site adjacent to Low Fen Drove Way. The depth of early stage planting of trees and hedges should be reviewed and where possible increased well beyond 7.5m.

LAN.02: For reasons set out in SHH 40 Item 9 and elsewhere, the earth bank should be a continuous circular earthwork, at least 5m high, not the catherine wheel or fan design shown



in section 8.4 of the DAS, with external slopes no less than 1:4 (or shallower if there is sufficient excavated material). This needs to be specified in the parameters in Schedule 14.

LAN.03: The idea that there should be some areas of ridge and furrow meadows to promote diversity in plant communities is fine. We are not convinced that these should be laid out concentrically, nor to a rigid standard distance between ridges. Slopes need to be a lot shallower than 1:4. It will not generally be sensible to excavate far into the subsoils or undertake a wholesale reworking of the ground in these areas. Ridge to furrow heights of c1.0m are more appropriate.

LAN.04: The 'target' species in section 3.4 of the LERMP and the sample tree etc planting species/diversity schedules in Appendix A to the LERMP are both acceptable but should be reviewed by ecologists/landscape designers in consultation with key stakeholders.

LAN.05: The SHH position is that the woodland planting in deep blocks is not characteristic of the strongly linear character of the immediate local landscape. The references to Anglesey Abbey and Little Wilbraham as the nearest examples, both around 5 miles away, bears this out. The 'rides' or 'vistas' between the blocks need to be at least 30m in width, drawing on classical parkland design principles.

LAN.06: Seed mixes should be subject to ecological and 'maintainability' review and consultation with key stakeholders, not 'approval by ecologists'.

LAN.07: Well dealt with in DAS Section 8. Refer to that.

LAN.08: References to 'visitor centre' should be changed. Materials for final surfacing of the access road and parking should be specified. Not all the hard landscaping around the buildings can be permeable and can include some more formal paving as required for access to buildings and other pedestrian routes eg to the car park.

### **3.9 Lighting**

LTG.01: Not aware that there is a commitment to monitor lighting effects nor any commitment to act if any adverse effects are found.

LTG.02: Generally, provision for actions during construction should be in the CoCP/CEMPs not the Design Code.

LTG.03: Applicant to confirm that Cambridge Airport does have this role on behalf of CAA.

SHH remains concerned about the need for, and height of, highway lighting on Horningsea Road. This should be reviewed in conjunction with the County Council as highway authority.

### **3.10 Associated Infrastructure**

This section could be deleted, since the points made relate to the CoCP and Soil Management Plans both of which are mandatory as part of the Requirements.

### 3.11 Outfall

Requirement 10 presents a comprehensive approach to taking forward the design of the outfall and this section needs to be drafted to reflect that, which it is not at present eg references to the 'detailed construction outfall management and monitoring plan' and its content in Requirement 10 (2) need to be made correctly in OTF.04 and OTF.05.

SHH and the ExA have raised concerns specifically about the feasibility and width etc of the reinstated footpath across the outfall and about the visual impacts if the concrete structure is as much as 0.5m above existing ground levels. The visualisation provided is definitely unrealistic. These points need to be addressed in the Design Code.

OTF.01: The dDCO covers this adequately.

OTF.02: Not really a meaningful commitment as drafted. Visual impact might be mitigable to a small extent by better siting of the compound.

OTF.03: Requirement for diversionary footpath during construction is already in dDCO.

OTF.06: Should say 'will take account of further modelling of potential river scour and bank erosion'.

### 3.11 Pipeline infrastructure

PLI.01: Access/maintenance chambers on the Waterbeach pipeline, discharge pipeline and transfer tunnel do have to impede farming access where structures are at or just below ground level. Drafting of this item needs review and correction.

### 3.12 Ventilation stack (at the interception shaft)

VST.01: There will need to be discussions between the Applicant and the developers about all elements of the Applicant's buried infrastructure on this site and the scope to resite this shaft is presumably very limited. The extent of any safeguarding around the vent stack may be addressable by building design. This text needs review.

### 3.13 Gas flare stack and shield

FSS.01: Should say 'avoid the flare being visible from outside the circular earthwork'.

## 4. Conclusions

The draft Design Code requires substantial redrafting to make it fit for purpose and to reflect the dDCO and other submitted documents. The carbon components of the Code should be included in a new Requirement in Schedule 2 to the dDCO and in a Design and Construction Carbon Management Plan, to be submitted at the next Examination deadline.

**CWWTPR DCO Examination**

**Submission by Save Honey Hill Group**

**19 February 2024**

**Comments on Hedgerow Regulations and Tree Preservation Plans 4.8, REP4-021**

1. The Applicant has provided updated Hedgerow Regulations and Tree Preservation Plans Rev 03 REP4-021. While various corrections appear to have been made to these plans, these still do not address concerns raised by SHH relating to the drafting of the dDCO Article 23 and the protection which that article and the HR and TP Plans read together are supposed to confer on trees and hedgerows within limits, particularly those on land along the pipeline routes.
2. These concerns and potential solutions were clearly set out in SHH 40 REP4-106 and briefly in paragraph 5.8 of SHH 41 REP4-109. We would expect these to have been addressed by the Applicant at D5.

## CWWTPR Examination

SHH 55

## Submission by Save Honey Hill Group

19 February 2024

## Response to ES Chapter 13 Historic Environment REP4-030 and Tables REP4-067

## Introduction

SHH is aware of ExQ2 13.1 to 13.8, and matters raised there in relation to effects and harm to historic assets are among those addressed in this response.

**1. Anomalies/Omissions in the ES**

- 1.1 On reviewing the revised HE Chapter 13 REP4-030 and Tables REP4-067, SHH has identified a number of anomalies /omissions. Those captured in ExQ2 Section 13 which are addressed to the Applicant are not repeated in this submission.
- 1.2 Designated historical asset HE078 has been omitted from the Temporary Construction effects from the Waterbeach Pipeline in Table 4.3 REP4-030 but is otherwise reported in REP4-067 as adverse impact and effect.
- 1.3 Inclusion of Waterbeach Conservation Area (CA) at para 4.2.16 REP4-030 under the heading WWTP implies the description and assessment of impact and effect presented relates to the construction of the WWTP. The Waterbeach CA is not included (assumed correctly) in the WWTP summary Tables 4.1,4.2,4.3. The text should be amended to make it clear that para 4.2.16 is relevant to the Waterbeach Pipeline only, or moved to the Waterbeach Pipeline section at 4.2.57.
- 1.4 Heading, *Effects on built heritage and historic landscape assets* page 62 REP4-030. Given the heading refers to historic landscape, it is an omission not to report specifically here the predicted assessment outcome of effects on HCLA22, reported at 4.2.57 as a permanent moderate adverse residual effect.
- 1.5 At para 5.3.5, notwithstanding SHH disagrees with the Applicant's assessment of a permanent slight residual effect on Baits Bite Lock (SHH REP1-171), according to the Significance Matrix Table, Table 2.3 REP4-030 and for consistency the sentence would be more accurate to report 'With the implementation of mitigation measures, the effects would be **neutral/** slight adverse (not significant) for all receptors except Biggin Abbey (HE011) where a temporary permanent moderate adverse (**significant**) effect is predicted.'

**2.0 Conservation Areas**

- 2.1 It is SHH view, as submitted REP1-171 page 100, that the potential permanent construction adverse effects on **Baits Bite Conservation Area** should be reported throughout Chapter 13 REP4-030 as moderate adverse impact and moderate adverse effect. Furthermore, after

mitigation this should remain as **permanent construction moderate adverse residual effect**. Table 4.2 REP4-030 reports a residual effect as 'slight'.

- 2.2 Table 4.1 REP4-030 identifies Temporary Construction effects as slight adverse effects on Fen Ditton Conservation Area (CA) and Horningsea Conservation Area (CA). The Applicant notes at the bottom of Table 4.1 that the impacts and effects tabled for Horningsea CA are cumulative, both in relation to the Waterbeach Pipeline and WWTP. In this case, SHH considers in accordance with the Impact Tables 2.2 and Significance Matrix Table 2.3, REP4-030 that Horningsea CA as a medium value asset should be assigned a **temporary construction moderate adverse impact and moderate adverse effect**.
- 2.3 As submitted in SHH REP1-171, the **permanent construction impacts and effects** on Fen Ditton Conservation Area and Horningsea Conservation Area should both be included in Chapter 13 REP4-030.
- 2.4 The HE Assessment Table (REP4-067) identifies a minor impact on Fen Ditton Conservation Area (CA) (HE096) and a negligible impact on Horningsea Conservation Area (CA) (HE097). As detailed in REP1-171, at para 10.4.2.1, it is SHH's view that, on account of the impact of the WWTP on the rural and agricultural setting of Horningsea CA and Fen Ditton CA, particularly as experienced on approach, both CAs should be assigned a **minor impact** and permanent slight adverse construction effect and that this should remain for both CA's as **permanent construction slight adverse** residual effect.
- 3.0 Principal Designated Buildings.**
- 3.1 As submitted by SHH in REP1-171, a **permanent construction slight adverse residual effect** on **Poplar Hall** is now reported and recorded in Table 4.2. REP4-030.
- 3.2 Wildfowl Cottage is not identified in HE Assessment Tables REP4--067 for any permanent post construction impact or effect. As submitted in REP1-171 it is SHH's view that on account of the impact the WWTP would have on the rural and agricultural setting on approach to **Wildfowl Cottage (HE042)** (via shared access road to Biggin Abbey), a permanent construction slight adverse effect should be assigned and remain as **permanent construction slight adverse residual effect**. This should be included in Table 4.2 of REP4-030.
- 3.3 Wildfowl Cottage is not identified in the HE Assessment Tables REP4--067 for any operational impact or effect. As submitted in REP1-171 it remains the view of SHH that **Wildfowl Cottage (HE042)**, on account of the impact of lighting and change in setting on approach (via shared access road to Biggin Abbey), this residence should be assigned as potential **operational slight adverse residual effect**. This should be included in Table 4.3 of REP4-030.
- 3.4 It is noted that SCDC, at para 9.37 REP4-092, identifies an operational moderate adverse effect on the historical assets listed at 4.3.3 REP4-030. SHH notes ExA Q2 13.7 and has assumed in this submission and below, in 3.5, the reference is to **all** those listed at para 4.3.3 of REP4-030.

- 3.5 In the case of Biggin Abbey and Poplar Hall, SHH agree with SCDC at para 9.37 REP4-092, that the changes to setting and operational impact would amount to an **operational moderate adverse residual effect**. This is on account of further urbanisation and degrading of the setting of these buildings arising from the impacts outlined at 4.3.6 REP4-030. These impacts will include visual impacts from far greater numbers of HGVs using the off slip road of the A14 than do so at present, because of the weight restrictions that exist on Horningsea Road on both the B1047 (18.0T) to the south and C210 (7.5T) to the north.
- 3.6 With reference to the Impact Table 2.2 REP4-030 a **minor-moderate impact** should be assigned to Biggin Abbey and Poplar Hall. In accordance with the Significance Matrix Table 2.3, high value assets and no mitigation measures relevant to operational effects, as identified by the Applicant at para 4.3.9, the changes as above and degree of impact amount to an **operational moderate adverse residual effect**.

#### 4.0 Other Designated Buildings

- 4.1 It is noted Tables 4.1 and 4.2 REP4-030 record negligible-minor impacts and slight adverse Temporary and Permanent Construction Effects on a number of buildings in addition to those above, principally located on High Ditch Road. Permanent construction residual effects are recorded in Table 4.2 as remaining slight adverse.
- 4.2 In identifying buildings that may be impacted, the Applicant relies on the visibility of WWTP directly from each one (See REP4-067 e.g. HE045; HE043; HE013).
- 4.3 It is SHH's view, supported by Historic England's guidance detailed in SHH RR-035 Section 10.4 and expanded in SHH REP1-171 Section 10.4.2.1, that assessment of impact is not limited to direct visibility from a designated building but includes the impact on the broader setting such as how the asset is approached and the inter-relationship between assets and historical landscape. Consequently, the circa 50 designated buildings situated within the three Conservation Areas of Fen Ditton, Bait's Bite Lock and Horningsea will all be impacted by the PD when travelling along important historical routes, namely Horningsea Road and High Ditch Road.
- 4.4 Historic England, at para 2.12 REP1-158, identifies the proposed site of the WWTP 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'.
- 4.5 Further, the Applicant at para 4.2.7 REP1-023 identifies Fen Ditton Conservation Area (CA) (HEO96) as comprising the core settlement of Fen Ditton and farmland surrounding it. It is described as retaining the character of a rural agricultural settlement and references the range of listed buildings at Grade II\* and II within it. The heritage value of the CA is described as derived from the architectural interest of its buildings and historic interest as the medieval core of the settlement. The setting is described as retaining its rural character despite the roads and that this makes a positive contribution to the heritage value of the asset.

- 4.6 The Applicant at para 4.2.10 REP4-030 describes Horningsea Conservation Area (CA) (HE099) as having a rural character as a small agricultural settlement on the edge of rural farmland of the South Cambs. Fens. The historic core of the village is identified along Horningsea Road and St. John's Lane. Listed buildings include those at Grade I and II. The heritage value is identified as derived from the architectural interest of its buildings and historical interest as the medieval core of the settlement. The setting including the River Cam and farmland on the fen edge is identified as making a positive contribution to its heritage value, providing context to the history and development of the setting.
- 4.7 It is evident that harm to the Conservation Areas will, by default, also harm all the historical buildings within the CAs; in this case as a result of adverse harm to the historic agricultural setting (identified by the Applicant as HCLA22 assigned permanent construction moderate adverse residual effect at para 4.4.57 REP4-030) and the introduction of an industrial plant into the rural setting of the Villages visible when travelling along Horningsea Road and High Ditch Road.

## 5.0 Cumulative Impact and Effects

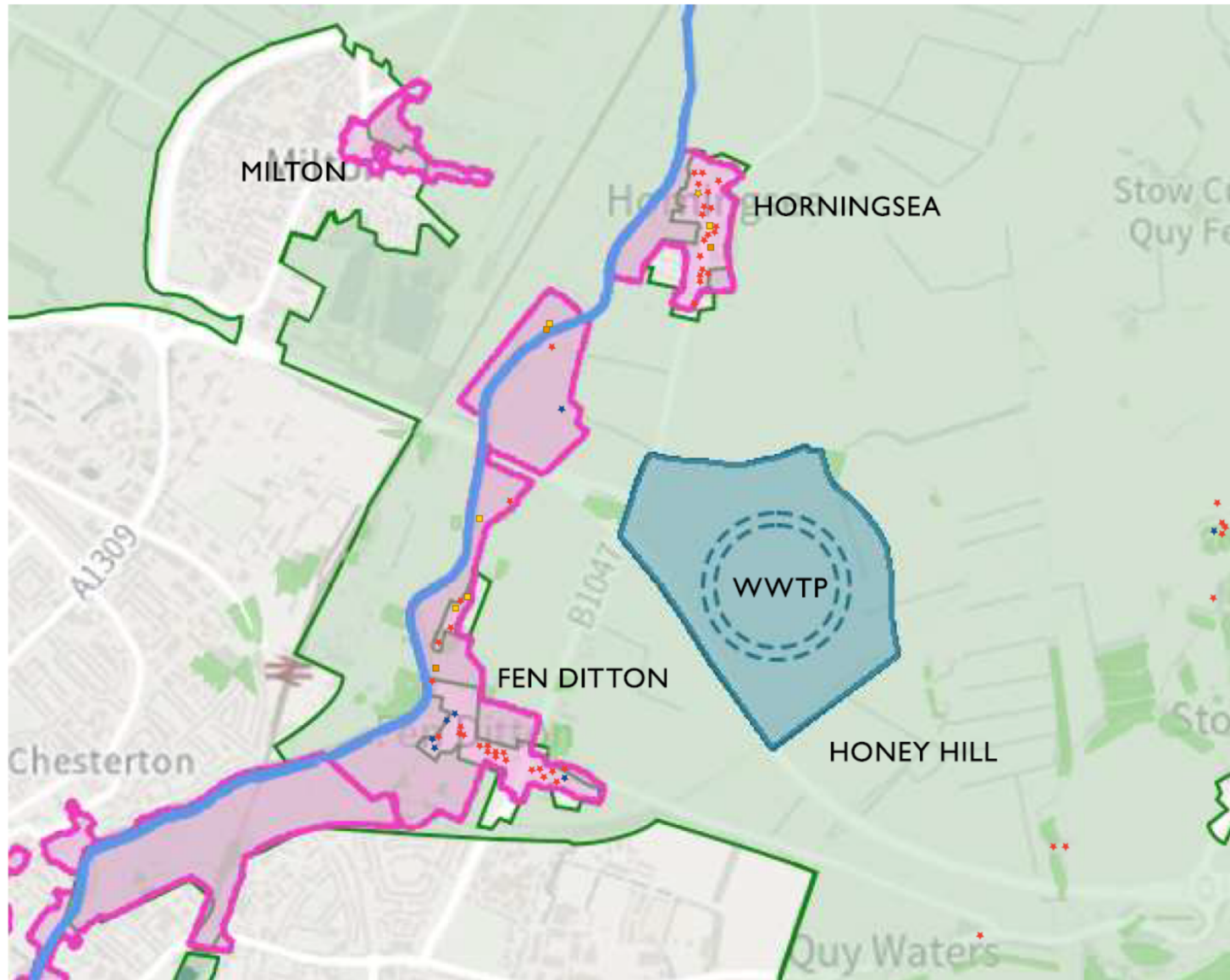
- 5.1 In considering the degree of harm to the circa 50 listed buildings it is SHH's view that a cumulative approach is relevant. Assessed on an individual basis with reference to Table 2.2 and 2.3 REP4-030 SHH accepts the potential impact on each building as high value assets in the temporary construction, construction and operational phase will be (with the exception of Biggin Abbey and Poplar Hall) negligible-minor impact and slight adverse residual effect.
- 5.2 However, in consideration of a cumulative effect on the three Conservation Areas, two of which are adjacent to each other, the number of listed buildings impacted set within the parameters of two small historic villages and a network of PROWs connecting them, identified as enhancing appreciation of the setting of Baits Bite Lock Conservation Area (4.2.4 REP-030), the overall impact and effect is, in SHH view adverse and of significance; the impact on the whole is greater than the sum of impact on the individual assets.
- 5.3 SHH, REP1-171 Section 7.5 pg 70-71, has noted the unique historical and geographical relationship between and among the three villages of Fen Ditton, Horningsea, Stow cum Quy, Stow cum Quy Fen SSSI, and the PROW network that connects them. The proposed WWTP will have a significant impact on the historical landscape character between the Villages and Fen as depicted in the Applicant's assessment of permanent moderate adverse residual effect on HCLA22.
- 5.4 In addition, the scale of the industrial infrastructure and permanent change in landscape will have a permanent adverse impact on the spatial relationship and cultural heritage of the three villages and designated assets within them all of which contribute to a shared sense of place. This adverse impact has not been captured in the Applicants assessment. It is the view of SHH that this adverse effect should be factored into cumulative effect.
- 5.5 The cumulative time scales are also significant. The construction period is identified as 4 years, a further 15 years of large scale exposed industrial plant before 'optimal maturation' of

landscape planting and beyond to permanent residual adverse effects (2.4.2,2.4.5,2.4.8 REP4-030).

- 5.6 It is SHH's understanding that the Applicant's assessment methodology does not provide for assessment or measure of cumulative impact on the historical environment.
- 5.7 SHH has not identified a figure or illustration amongst the Applicant's submissions that adequately demonstrates the scale of the proposed WWTP and landscape proposals in relation to the two Villages, Conservation Areas and designated historical assets within them.
- 5.8 Fig 1. below has been produced by SHH using official sources to provide an illustration and appreciation of the cumulative impact and effect on the historic environment. The relevant historical routes, High Ditch Road and Horningsea Road are depicted as pale white lines. The impact on the spatial relationship between the three villages and Stow cum Quy Fen can also be seen with Stow cum Quy village and Fen both partially captured to the east.



Fig 1. Proposed Development, Green Belt, Conservation Areas & Listed Buildings – Fen Ditton & Horningsea



Key

- S/NEC  
North East Cambridge
- S/CE/SS/3(1a)  
Land North of Newmarket Road,  
South Cambridgeshire
- S/CE  
Cambridge East
- S/CE/R47  
Land North of Cherry Hinton,  
Cambridge
- Waste Water Treatment Plant  
(WWTP)
- Green Belt
- Enhancement of the Eastern Fens
- Gog Magog and Chalkland fringe
- North Cambridge Green Space
- Grade I Listed
- Grade II\* Listed
- Grade II Listed
- Non-designated built heritage asset  
(CHER, point)
- Other non-designated built heritage  
asset

Green belt map reproduced from [https://maps.cambridgeshire.gov.uk/?tab=maps:Conservation Areas](https://maps.cambridgeshire.gov.uk/?tab=maps:Conservation%20Areas) reproduced from <https://www.scambs.gov.uk/planning/search-by-map>; Heritage Assets reproduced from <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/WW010003/WW010003-000633-5.3.13%20ES%20Volume%203%20Book%20of%20Figures%20Historic%20Environment.pdf>  
<https://maps.3csharedservices.org/portal/apps/webappviewer/index.html?id=ad4388668ec04c3fb5913a31cb800790>

CWWTPR DCO Examination

SHH 56

Submission by Save Honey Hill Group

19 February 2024

Comments on ES Chapter 15 Landscape and Visual Assessment 5.2.15 [REP4-033]

## Introduction

These comments relate to the latest version of 5.2.15 submitted as REP4-033

### 1. Discharge Outfall

- 1.1. In Table 2.6 pg 38 REP4-033, the parameters of the concrete treated effluent discharge outfall has been amended to 12m long to 7m (previously 6m) wide. The total length of bank intended to be piled or to form the concrete outfall is stated as 55mm.
- 1.2. SHH notes and welcomes ExQ2 7.11 which will clarify some of the parameters of the land that would be remaining after the installation of the outfall structure to accommodate the existing Footpath 85/6.
- 1.3. The outfall structure is described in Table 2.6 pg 38 REP4-033 as **pre-cast and designed to ensure it aligns with existing ground levels and will therefore not obstruct Footpath 85/6.** However, the design parameters for the roof of the outfall chamber are actually specified *as a maximum of 0.5m above existing ground level and will be covered in soil to integrate the structure with the surrounding ground levels. The soil on the outfall chamber roof will be seeded with grass seed.* This statement reflects the stated maximum height parameters now in Schedule 14.
- 1.4. If the outfall is constructed at the maximum height of 0.5m above existing ground level and taking account of, say, a footpath surfacing in soil and grass, a minimum of 150mm in depth, this will create a significant adverse visual impact, viewed from both sides of the river. This structure will also impede the safe and pleasant use of Footpath 85/6, even if provided with an access ramp at either side. The ramps at either side would themselves need to be up to 8m in length.
- 1.5. As submitted in REP3-068 at para 8.2.8, SHH questions the sustainability of topsoil and grass seed on a concrete platform installed at ground level in an area of high footfall in wet and dry conditions. This would be further exacerbated if the finished level of the platform was above ground level.
- 1.6. Table 2.7 pg 75 REP4-033 states under Mitigation measures: *Design of the outfall includes localised earthworks and seeding to conceal and integrate the outfall into the riverbank.* It is SHH view, mitigation measures to conceal the concrete roof will not be sufficient to return

Footpath 85/6 to its original condition in the short or long term (as defined by the Applicant) and will not mitigate against harm to the visual amenity in this area.

- 1.7. SHH REP1-171 at para 8.2.8 (ii) stated *A VP is required to capture the visual impact of the new discharge/outfall from PROW 85/6 that runs directly alongside it looking north...* and noted this recommendation had been made in previous consultations.
- 1.8. The Applicant's response REP2-038 at 8.2 pg 25 to the above was that *The LVIA (App Doc Ref 5.2.15) [AS-034] assessed the impact of the treated effluent discharge outfall on views from Viewpoint 23 on Footpath Milton 162/1 which is on the opposite side of the river (on the tow path) from the outfall. The outfall will be less apparent from the eastern side of the river, on Footpath Fen Ditton 85/6, as the roof will be at or around ground level, covered in earth and seeded with grass seed.*
- 1.9. It remains SHH's view that an assessment of impact and effect on visual amenity from Footpath 85/6 looking north is necessary, which must reflect the maximum design parameter of the height of the concrete roof. This needs to show the existing ditch, fencing, alignment of Footpath 85/6, new engineering structures, new river alignment and new reed planting. It remains SHH's fundamental position that the maximum design parameter should be reduced to 4.5m AOD plus no more than 0.2m

## 2. Lighting

- 2.1. SHH notes that on pg 39 REP4-033 shows an amendment to the street lighting extending north from the A14 bridge to Low Fen Drove Way from 100m to 130m in length. SHH has questioned the need for this additional lighting and whether, if it is provided, it needs to be 10 or 12m high highway lighting. The Applicant's position appears to be to leave any decision about the specification or height of the lighting to the County Council as highway authority. Low Fen Drove Way is directly opposite the driveway entrance to Biggin Abbey. In the absence an alternative commitment by the Applicant, this lighting must be assumed to be this worst case.
- 2.2. VP 24 representing residents at *Biggin Abbey House Residents at Biggin Abbey House and associated cottages and users of Footpath Fen Ditton 85/8 looking south and east* identifies in the Baseline Assessment Table 3.2 pg 57 identifies *night time views over unlit farmland*.
- 2.3. The impact of new street lighting extending northwards from the A14 bridge has not been captured in the impact assessment tables. Table 4.6 REP4-033 Visual effects during operation, considering mitigation VP24 Night-Time, refers only to lighting inside the WWTP and concludes, taking into account all mitigation measures at year 15, the magnitude of change would be negligible and effect slight adverse.
- 2.4. SHH believes that this underestimates the likely impacts of this lighting, which applying the Magnitude of Impact Table 2.1 and Significance of Effect Table 2.3 in REP4-033 and a high sensitivity receptor at VP24 Night Time, that the impact should be reported as moderate

adverse, with a moderate adverse residual effect.

### **3. Conclusions on the LVA Assessment**

- 3.1.** As submitted in RR-035 and elaborated in REP1-171, it is SHH's view that generally throughout the LVA, the impact of the PD on visual amenity has been underestimated and the effect of mitigation measures overestimated. Observations and comments made in this response to the up-dated LVA in REP4-033 provide further evidence to support this position.

## CWWTPR DCO Examination

SHH 57

## Submission by Save Honey Hill Group

19 February 2024

## Responses to the LERMP Rev 03 [REP4-057]

**1. Introduction**

- 1.1 SHH made submissions at ISH3 in relation to various aspects of the landscape design, in particular, on the planting, watering and management of trees. See SHH 41 [REP4-109] in particular, paragraphs 8.3 to 8.9. This submission does not repeat points made at ISH3 except where relevant.
- 1.2 The Applicant has since submitted the LERMP Rev 03 at D4. The Applicant has also provided 'comparable examples of tree planting on artificially created bunds' in response to Hearing Action Point 93 in Appendix H of REP4-087 8.20 Applicant's Response to ExA's Action Points at Hearings. The ExA has also asked questions in ExQ2 on related matters, notably ExQ2 5.9 and 14.4.

**2 Response to LERMP Rev 03**

- 2.1 **Advisory Group/Operational Management Group:** In para 4.1.2, the Applicant says it will establish an Advisory Group prior to works commencing to advise on delivery of the planting and the LERMP and that this then will merge into the Operational Management Group. Unlike the ExA in ExQ2 5.9, we believe this to be a separate group to that the Applicant says is already in existence and met in January to consider recreational and other wider countryside impacts. The Advisory Group needs appropriate professional expertise in landscape, ecological and countryside management to be useful. Para 4.1.3 refers to the Requirements in Schedule 2 as the means to secure the delivery of this Advisory Group and presumably its continuation into the Operational Management Group. In our view, neither the wording of the LERMP nor Requirement 11 adequately secure the creation or membership of the AG/OMG. This needs to be rectified.
- 2.2 **Comparable Examples of Established Planting on Artificially Created Bunds:** The examples provided in Appendix H of REP4-087 are not comparable to the bund planting proposed in the application, nor are the examples properly documented in terms of bund shape, drainage or materials; age, heights and density of tree and shrub growth, nor are they photographed under winter conditions. The best example given appears to be the Stoke Hammond bypass, but it is impossible to tell if it is a two sided bund or earthwork or what the dimensions are. None of the examples given are:
- (i) from comparable low annual rainfall locations c 650mm pa on chalk or chalk marl subsoils/fill;
  - (ii) planted only with a narrow 2 to 3 metre deep single row of standard trees and hedging on top of the bund. It is far more normal when planting on embankments or bunds is undertaken to also plant the upper sloping parts or the whole of the front and back slopes to give much deeper planting, which is a better winter visual screen, can allow for some planting or growth failures and is less susceptible to wind blow damage. A 2 to 3

metre deep deciduous planting will not provide the density of branches to provide a proper winter screen up to anything like 7m above the top of the bund. Examples already provided by SHH of a 25 year old 7.5m deep screen planting on the chalk at Bottisham illustrate this point clearly.

- 2.3 Earthwork Shape and Size: SHH has asked for the exact minimum dimensions of the earthwork to be specified in Schedule 14 of the dDCO, as we believe the Applicant agreed to do at ISH3. To reiterate, this needs to set the following dimensions/requirements: a continuous single bank, height to be not less than 5.0m above the highest external existing ground level, maximum side slopes of 1:2.5 internally and 1:4 externally, with a minimum flat top width of 6.0m. It is difficult to understand why the Applicant continues to refuse to set this out in Schedule 14 to the dDCO, but has chosen to include the statement about dimensions in the draft Design Code 7.17 [REP4-085] as LAN.02. The dimensions presented in LAN.02 are not satisfactory, referring to an 'outer slope between 1:2.5 and 1:5, where landforms are their widest'. The outer slope needs to be as shallow as practicable, nowhere less than 1:4 and, if possible, flared out where it meets the ground surface. Steeper slopes both look unnatural and will exacerbate the runoff of rainfall that is of such concern in relation to tree health. The phrase 'where landforms are at their widest' is meaningless, given that the existing landscape here is an almost imperceptible east-west slope. SHH's formulation needs to be incorporated into Schedule 14.
- 2.4 It is also still the case that, in the LERMP at Figures 3.1 and 3.5, the Masterplan and Elevations show what SHH has described as a 'catherine wheel' or 'turbine fan blade' design for the banks separating them with lower paths. This is geometrically close to impossible to build and will not achieve a continuous 5m above existing ground height or meet the other necessary top width and slope parameters. This is illustrated by the dips in the crest elevation in Figure 3.5, which may well not be to scale. It is also a very inefficient use of excavated material, which the Applicant claims is in short supply. Figures 3.1 and 3.5 in the LERMP need to be updated to a continuous bank design and the parameters included in Schedule 14, for the avoidance of doubt.
- 2.5 Early Stage Planting: We remind the Applicant and the ExA of our request at para 8.7 of REP4-109 for deeper and more adequate early stage boundary planting.
- 2.6 Watering and Replanting Commitments: We note that the Applicant has amended the LERMP in para 4.2.2 and parts of Tables 4.1 and 4.2. This has improved the drafting and included a reference to the Advisory Group advising on watering and replanting, but it remains unclear and inconsistent between text and tables, as the ExQ2 also notes, with the unhelpful use of 'not applicable' in the tables. The long term commitment to annual monitoring and replanting needs to be made clear.
- 2.7 To repeat para 8.8 of REP4-109, 'the commitment in para 4.2.2 to watering should be for routine watering of trees on top of the bund for **five years** and for **two years** for all other trees and hedges planted. There should be supplemental watering if there are dry periods in spring and early summer which should extend for **a further 3 years** in each case (ii) where replanting has to take place, these watering commitments must restart for that planting'. As it stands, the latest wording in para 4.2.2 is not carried forward consistently into Table 4.1

e.g. see page 47, second row from bottom and page 48, bottom row. Table 4.2 page 63 is the first reference to the role of the Advisory Group in relation to watering or replanting. This should be made in para 4.2.2. Table 4.2 page 64 has an odd reference to 'No additional watering of woodlands should be necessary after Year 3'. Para 4.2.2 and these tables need to be forensically checked and corrected to be consistent with each other.

### 3 Conclusions

The LERMP is intended as the benchmark or basis for detailed design and implementation of the permanent landscape works and to inform subsequent detailed approvals under the Requirements, in particular, 7(1)(c) and 11. It needs to be updated to take account of the concerns set out above and any other matters which the ExA wishes to see amended.

**CWWTPR Examination****Submission by Save Honey Hill Group****19 February 2024****SHH 58 Comments on REP4-069 5.4.19.7 Rev 05 Construction Traffic Management Plan and App. F to REP4-087****1. Introduction**

These comments relate to the latest version of the CTMP, but also refer to matters raised at ISH3 by SHH and Waterbeach PC, which are set out in REP4-109 Section 3.

**2. Construction Access Routes and Points**

Can Figure 4.1 please be updated to show all of the Construction and Operational Access points as set out in the DCO and tabulated in Appendix A to make the CTMP easier to use.

**3. Abnormal Loads Peak Hours**

- 3.1 SHH notes the amendments at para 4.2.4 and 4.2.5 that abnormal loads accessing the site from or onto Horningsea Road will do so outside revised peak hours of 8am to 9:30am and 3.30pm to 6pm Monday to Friday.
- 3.2 In addition, this junction is busy with shopping, leisure and football traffic on Saturdays and Sundays, mainly between 11:00 am and 3:00 pm and abnormal loads should be avoided during these hours as well.
- 3.3 Abnormal Indivisible Loads through Waterbeach and Clayhithe should also be restricted to pre-planned and notified movements outside peak hours and scheduled to provide minimum disruption. This is likely to be especially necessary on Bannold Road and Station Road/Clayhithe Road given the need to cross the railway and for temporary parking restrictions and traffic control. See also REP4-109 SHH 46 ISH3 Day 1 Note of Oral Submissions paragraph 3.1.

**4 Highway Restoration**

SHH notes the amendment at para 6.8.2 requiring temporary access reinstatement to be completed within 3 months following completion of all engineering construction, commissioning and landscape planting and that this relates to each temporary access as that development is reached.

**5 Construction Traffic Management in Waterbeach and Clayhithe**

SHH notes that paragraph 6.9.11 refers to restricting HGV movements in Waterbeach to outside school peak hours.

SHH made a detailed submission in REP4-109 paras 3.3 to 3.8, concerning construction traffic management in Waterbeach and Clayhithe. This clarified and extended what was said at ISH3. The Applicant needs to consider these requests for more appropriate peak hour restrictions and to setting a daily maximum for HGV movements or other appropriate mitigation measures. SHH has also asked at ISH3 in paragraph 3.1 for the Applicant to report on the adequacy and status of,



including weight limits on, Clayhithe Bridge for large loads on low clearance trailers which must be confirmed, or the measures used to address deficiencies detailed. This has not been addressed in Appendix F RAP4-087 Applicant's response to ExA Hearing Actions.

SHH notes the proposed management of AIL at level crossing on Clayhithe Road/Station Road and requires similar management at the left hand turn for AIL travelling south and turning into Hartridge's Lane, a narrow lane after a sharp bend on Clayhithe Road.

#### **6 Low Fen Drove Way**

Article 13 and Schedule 6 of the dDCO needs to be amended to restrict/prevent excessive incursions by unnecessary traffic on Low Fen Drove. This will require changes to the CTMP to ensure legitimate access to properties [REP1-169 - SHH ISH1 Oral Submission].

#### **7 Strategic Road Network Incidents**

It is recognised that AIL and HGVs for the main site will normally travel on the SRN accessing the site via Junction 34 of the A14. Provision is needed to prevent AIL diversion through Denny End or Car Dyke Roads and onto Station Road and Clayhithe Road, when there are blockages of the SRN, especially the A10 approaching Junction 33 and both carriageways of A14. This would also prevent the use of High Street Horningsea by AIL and HGVs.

#### **8 Monitoring and Enforcement of Controls**

SHH notes the provisions in Sections 6 and 7 for contractual requirements via the main contractor and for the use of ANPR to monitor HGV movements. The CTMP is still unclear about whether construction vehicle routing and other restrictions will be cascaded to all suppliers of services, plant and equipment and whether provisions will apply to some or all LGVs. The Applicant needs to make this clear, not least so that local communities, when assisting in monitoring vehicle movements, know clearly which vehicles are or are not contravening the policy.

CWWTPR DCO Examination

SHH 59

Submission by Save Honey Hill Group

19 February 2024

Response to Lighting Design Strategy REP4-048

**1. Introduction**

- 1.1. The Lighting Design Strategy (LDS), updated 16 January (REP4-048), incorporates guidance from The Bat Conservation Trust.
- 1.2. The focus of SHH comments on bat issues centre around section 2.4.10, which considers the Trust's guidance and also considers evidence in REP2-071 provided by Small Ecology Ltd.
- 1.3. At Phase 3 Consultation, SHH recommended limiting night-time lighting, both during construction and by plant and vehicle operations, to reduce predation by raptors and gulls. This was reinforced at SHH Relevant Representation (RR-035) and at 10.5.1 of Written Representation REP1-171.
- 1.4. These comments should be read in conjunction with SHH 56 Comments on ES Ch. 15 LVA REP4-033.

**2. Impact on bat populations**

- 2.1. Ponds and other areas of open standing water within the plant are likely to generate airborne insects and thereby attract bats to their detriment if the areas are illuminated, so exposing them to predation.
- 2.2. At the Final Settlement Tanks (Area 7 pg 36) lighting is by PIR controls at heights no greater than 5m AGL, but lighting on rotating bridges is at maximum height of 9m AGL and in emergencies is activated manually until timed out each morning, if unnecessarily left on. This is likely to impact bat navigation.
- 2.3. Although bats use 'radar' for navigation rather than light, they are aware of light and can be harmed by it. We note that section 4.3.1 states that 'a warm white spectrum (ideally < 2700 Kelvin) should be adopted to reduce blue light component to minimise the effect on bats' and that 'luminaires should feature peak wavelengths higher than 550 nanometers to avoid the component of light most disturbing to bats.' It is essential that these restrictions are complied with.
- 2.4. SHH has noted before (REP1-171 10.5.1) that a plant of this scale, constructed in an area which should arguably be classified as being part of an E1 Environmental Zone in terms of existing ambient artificial lighting levels, is bound to cause ecological upheaval through light pollution alone. SHH contends that the area north of the A14 towards Anglesey Abbey is very different, in terms of ambient artificial lighting levels, from the E2 zones in which the Cambridge's urban fringe and Milton village are classified (Section 3.3.3; Table 3-1).
- 2.5. SHH notes that, at pg 79 of Lighting Assessment Report (AS-101), the Applicant commits to following the best practice guidance to inform design development by using ILO and Bat Conservation Trust Guidance Note 08/18. Compliance should be monitored by Cambridgeshire County Council.

- 2.6. The Applicant has not responded to the comments from Chris Smith of Small Ecology (REP2-071) on their surveys' lack of compliance with best practice and the need for further surveys to demonstrate there is no impact on Wimpole Woods SAC or the interlinked populations of barbastelle bats.

### **3. Impact on local area**

- 3.1. SHH has commented (10.5.1 REP1-171) on the impact of Operational Lighting. While Fig. A1 and subsequent text describes in detail the provision of lighting in the 19 areas of the works, details of lighting on the access road to the Gateway Building, HGV parking area and staff car park is vague although lighting in this area will have an impact on Biggin Abbey (pg 40).
- 3.2. Lighting of the contractor's compound and vehicle park during four years of construction will have a considerable impact on Biggin Abbey residents. During operations there can be no reliance on screening by deciduous trees in winter and little at other times until fully established at 15 years.
- 3.3. In SHH 56 Comments on ES Ch. 15 LVA REP4-033, SHH has questioned the additional lighting from the A14 bridge to Low Fen Drove Way and the deferral of a decision on height to the Cambridgeshire County Council, as highway authority.

CWWTPR DCO Examination at Deadline 5

The following lists the documents submitted during Examination by Save Honey Hill Group

SHH Doc. No.	ExLib No.	SHH Title	PINS Title	Recipient	Submission date	Acknowledged	Published
SHH 01	RR-035	Save Honey Hill Relevant Representations	Save Honey Hill Group	PINS	19/07/23	19/07/23	Oct. 2023
SHH 02	PDA-003	Procedural request – Timetable change	PM SHH Request for Change of Timetable Save Honey Hill Group	PINS	10/10/23	10/10/23	Oct. 2023
SHH 03	REP1-175 Rep1-176	Video, pro-forma. Video transcripts	Written Representations (video) Written Representations (video transcript)	PINS	25/10/23	27/10/23	24/11/23
SHH 04	REP1-171	Save Honey Hill Written Representations	Written Representations	PINS	By WeTransfer 20/11/23	By e-mail 21/11/23	24/11/23
SHH 05	REP1-172	Save Honey Hill Written Representations Appendix A: Health Survey Methodology & Results	Written Representations (appendices)	PINS	D1 20/11/23	20/11/23	24/11/23
SHH 06	REP1-172	Save Honey Hill Written Representations Appendix B: CUED Greenhouse Gas Emissions Accounting for Demolition CWWTP	Written Representations (appendices)	PINS	D1 20/11/23	20/11/23	24/11/23

Save Honey Hill Group Submissions updated at D5

SHH 60

SHH 07	REP1-167 REP1-168	Request for Additional Locations to include in Accompanied Site Inspection (ASI) & wish to attend	Notification of wish to attend ASI Comments on ASI locations	PINS	31/10/23	31/11/23 22752	24/11/23
SHH 08	REP1-172	Save Honey Hill Written Representations Appendix C: Design Critique	Written Representations (appendices)	PINS	D1 20/11/23	20/11/23	24/11/23
SHH 09	REP1-173 REP1-174	SHH Appendix E Additional reference documents: Darwin Green JDCC 18/10/23 Brookgate	Written Representations (supporting information)	PINS	D1 20/11/23	20/11/23	24/11/23
SHH 10	REP1-172	Save Honey Hill Written Representations Appendix D: Maps	Written Representations (appendices)	PINS	D1 20/11/23	20/11/23	24/11/23
SHH 11		SHH Request to Applicant for Amendments and Clarifications to dDCO and Plans as introduced at ISH1.		AW	30/10/23	28/11/23	
SHH 12	REP1-169	ISH1 dDCO SHH Summary of Oral Submissions FINAL 061123	Summary of Oral Submissions at ISH1	PINS	D1 20/11/23	20/11/23	24/11/23
SHH 13	REP1-170	SHH Summary of Oral Submissions re Principle of Development at ISH2	Summary of Oral Submissions at ISH2	PINS	D1 20/11/23	20/11/23	24/11/23

Save Honey Hill Group Submissions updated at D5

SHH 60

SHH 14	REP1-172	Save Honey Hill Written Representation Appendix F Summary	Written Representations (appendices)	PINS	D1 20/11/23	20/11/23	24/11/23
SHH 15		SHH Response to SoCG Rev 01		AW	With AW		
SHH 16		Not used					
SHH 17	REP2-058	SHH Covering letter	Comments on responses to ExA's ExQ1	PINS	D2 06/12/23	receipt 24300	10/12/23
SHH 18	REP2-059	SHH Comments on SCDC Responses to ExQ1	Comments on responses to ExA's ExQ1- 2	PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 19	REP3-065	Comments on Cambs. County Council LIR	Comments on Local Impact Report - 1	PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 20	REP3-066	Comments on SCDC LIR	Comments on Local Impact Report -2	PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 21	REP3-064	Comments on City Council LIR	Comments on Local Impact Report	PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 22	REP3-067	HIF Grant Conditions Submissions	Comments on any submissions received at D1-part 1	PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 23	REP3-068	Comments on Errors and Omissions in Planning Statement	Comments on any submissions received at D1-part 2	PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 24		SHH 11 Updated to Reflect dDCO at Rev 05		AW/PINS	With AW	Automated receipt 24300	10/12/23

SHH 25		Request for Changes to Schedule 2 Requirements		AW/PINS	With AW	Automated receipt 24300	10/12/23
SHH 26	REP2-060	SHH Comments on EA responses to ExQ1	Comments on responses to ExA's ExQ1- 3	AW/PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 27	REP2-069	Comments on Natural England WR	Comments on Natural England's Written Representations	PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 28	REP2-063	SHH Comments on Applicant's responses to ExQ1	Comments on responses to ExA's ExQ1- 1	PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 29	REP2-061	SHH comments on City Council Responses to ExQ1	Comments on responses to ExA's ExQ1- 4	PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 30	REP2-062	SHH comments on County Council Responses to ExQ1	Comments on responses to ExA's ExQ1- 5	PINS	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 31	REP2-070	SHH comments on EA-AW SoCG	Comments on Anglian Water – Environment Agency progressed SoCG	PINS/AW	D2 06/12/23	Automated receipt 24300	10/12/23
SHH 32	REP2-067	Response to SCDC and Cambridge City Council Amendments to LIRs	Comments to comments on SCDC and Cambridge City Council amended Local Impact Report (LIR)	PINS	D3 18/12/23	Automated receipt	25/01/24
SHH 33	REP2-068	Response to SCDC and City Council Comments on SHH WR	Comments on any submissions received at D1 – part 2	PINS	D3 18/12/23	Automated receipt	25/01/24
SHH 34 SHH 34 Expd.	REP2-068 REP4-108	Comments on 8.13 Applicant's Responses on WRs Expanded as tracked and clean	Comments on any submissions received at D1 – part 2. Comments on any submissions received at D3 D4-3	PINS	D3 18/12/23 D4 22/01/24	Automated receipt 25733	25/01/24

SHH 35	REP4-106	SHH Response to the Applicant’s Responses to Written Representations Document 8.13 [REP2-038]	Comments on any submissions received at D3 D4-1	PINS	D4 22/01/24	Automated receipt 25733	25/01/24
SHH 36		Letter to Lead ExA re deferral of ISH 2		PINS	D3 14/12/23	Personal e-mail - rejected	
SHH 37	REP2-065	Submissions for D3 and Further Submissions Cover Letter	Comments on any submissions received at D2	PINS	D3 18/12/23	Automated receipt	
SHH 38	REP2-066	Comments on Applicant’s Responses to LIRs	Response to Applicant’s comments on Local Impact Report (LIR)	PINS	D3 18/12/23	Automated receipt	
SHH 39	REP4-106	Inconsistencies & Errors in ES Ch 2 to AW (MD) 12/01/24	Comments on any submissions received at D3 D4-1	AW/PINS	D4 22/01/24	Automated receipt 25733	25/01/24
SHH 40	REP4-106	SHH Outstanding Concerns about Drafting of dDCO and Relevant Plans	Comments on any submissions received at D3 D4-2	PINS/AW	D4 22/01/24	Automated receipt 25733	25/01/24
SHH 41	REP4-109	ISH3 – Environmental Matters Day 2, 11 January 2024; Summary of Oral Submissions	Written Summaries of oral submissions made at any hearing D4-4	PINS	D4 22/01/24	Automated receipt 25733	25/01/24
SHH 42	REP4-106	SHH Response to the Applicant’s comments on Save Honey Hill’s Deadline 2 submissions 8.14 – Sections 2.9 and 2.5 - Funding [REP3-054]	Comments on any submissions received at D3 D41	PINS	D4 22/01/24	Automated receipt 25733	25/01/24
SHH 43	REP4-106	Note regarding Quy Fen and Black Ditch: Water	Comments on any submissions received at D3 D4-1	PINS	D4 22/01/24	Automated receipt 25733	25/01/24



		Pollution Control and Monitoring					
SHH 45	REP4-109	CAH1 – Compulsory Acquisition Hearing 1, 9 January 2024: Summary of Oral Submissions	Written Summaries of oral submissions made at any hearing D4-4	PINS	D4 22/01/24	Automated receipt 25733	25/01/24
SHH 46	REP4-109	ISH3 – Environmental Matters Day 1: Summary of Oral submissions	Written Summaries of oral submissions made at any hearing D4-4	PINS	D4 22/01/24	Automated receipt 25733	25/01/24
SHH 47	REP4-105	D4 Submissions by SHH at D4	Description and list of submitted documents	PINS	D4 25/01/24	By e-mail	26/01/24
SHH 48		Response to Strategic Carbon Assessment and Carbon Conclusions REP3-042 REP2-037		PINS	D5 19/02/24		
SHH 49		SoCG Rev 02 SHH proposed amendments		AW	26/01/24	With AW	
SHH 50		SHH Response to the SCDC REP3-060 Comments on LIR Responses		PINS	19/02/24		
SHH 51		Responses to ExQ2		PINS	19/02/24		
SHH 52		Response to REP4-027 ES Chapter 10 Carbon and Conclusions on Carbon		PINS	D5 19/02/24		
SHH 53		Response to draft Design Code REP4-085		PINS	D5 19/02/24		
SHH 54		Comments on Hedgerow and Tree Preservation Plans REP4-021		PINS	D5 19/02/24		
SHH 55		Response to ES Chapter 13 Historic Environment REP4-030 and Tables REP4-067		PINS	D5 19/02/24		

SHH 56		Comments on ES Chapter 15 LVA REP4-033.		PINS	D5 19/02/24		
SHH 57		Response to LERMP Rev 03 REP4-057		PINS	D5 19/02/24		
SHH 58		Comments on REP4-069 5.4.19.7 Rev 05 Construction Traffic Management Plan and App. F to REP4-087		PINS	D5 19/02/24		
SHH 59		Comments on Lighting Design Strategy REP4-048		PINS	D5 19/02/24		
SHH 60		List of SHH submissions updated at D5		PINS	D5 19/02/24		