

RR 14-07-2023 Ref Anglian Water – Cambridge Waste Water Treatment Works

Introduction

The focus of this representation is on the Harm to Green Belt and Very Special Circumstances. The case is made that the Proposed Development (PD) would be of very high harm to the purposes of the Cambridge Green Belt and that the benefits proposed by Anglian Water (AW) do not outweigh the harm sufficiently to meet the ‘very special circumstances’ required to qualify the PD for a Development Consent Order. A Conclusion is provided.

References to AW DCO application documents are included in the text only, other references (principally local authority and national planning references) are provided in a list with Hyperlinks at the end of the document.

1.0 Harm to Green Belt

The land identified by Anglian Water (AW) for the Cambridge Waste Water Treatment Plant Relocation (PD) and surrounding area is of high quality Open Green Belt free from urban development and as such fulfils the ‘essential characteristic’ of Green Belt para 137 (NPPF 2021).

The site area proposed by AW has not been identified as suitable for release from the Cambridge Green Belt in any historical Green Belt study or Local Plan Policy, or in the emerging Local Plan (GCP ELP FP 2021). Independent Green Belt Studies supporting the existing and emerging Local Plan concluded any development within the vicinity would cause substantial harm/very high harm respectively to the purposes of the Cambridge Green Belt (SCDC GB 2015; LUC 2021). In contrast, the Green Belt assessment conducted by AW and which adopted the LUC (2021) methodology, concluded the Proposed Development (PD) would have a moderate impact of harm on the purposes of the Cambridge Green Belt (AW 7.5.3).

A review of AW’s Green Belt (GB) assessment and supporting text suggests this was conducted at a relatively high level and a number of omissions have been found that help explain the differences in assessment outcomes. For example, factors relating to the special qualities of the Cambridge setting of relevance to Cambridge Green Belt Purpose 2, specified in the existing Local Plan (SCDC 2018) and detailed in the LUC (2021) methodology, have been omitted from consideration, in particular the impact on ‘designated sites and other features contributing positively to the character of the landscape setting’. This factor is of high relevance to the immediate area in assessing the impact of the proposed development (PD) to the CWWTP parcel and adjacent land identified by AW in its GB assessment.

In accordance with LUC (2021) methodology, designated features of relevance to the GB in the immediate area include: a strong historical environment with conservation areas and multiple listed properties including high grade I and II*; a strong PROW network and a distinct designated landscape character which includes wide distant views and small linear villages that have retained their historic rural setting and form; strategic green infrastructure including, the National Trust Wicken Fen Vision. All of the above are included in the defined ‘special characteristics’ of the Cambridge Green Belt and relevant to an assessment of harm the PD will have on the purposes of the Cambridge Green Belt (SCDC 2018; LUC 2021). They are not however reflected in the supporting text of the AW GB assessment (7.5.3).

It is noted AW conclude the PD will impact only a small proportion of the GB parcel OA2 (Outer Area 2) as identified by LUC (2021). OA2 is a large parcel of open GB separating a number of villages. The CWWTP parcel lies within OA2. AW in its assessment considers the remaining GB in OA2 as 'adjacent Green Belt' and only a small proportion of the remaining OA2. However, it is considered more appropriate in the context of identifying the scale of impact on the GB parcel OA2 that the CWWTP parcel and adjacent Green Belt impacted should be considered collectively, and as such the PD will impact a substantial proportion of OA2; the southern sector. Contrary to AW's conclusion, it is believed therefore the harmful impact on GB parcel OA2 would be significant.

It is considered that if AW had conducted the Green Belt Assessment true to the defining characteristics of the Cambridge Green Belt as identified in the existing Local Plan (SCDC 2018) and the LUC (2021) methodology the same conclusion would be reached; that a development of strategic scale in the area would give rise to 'very high harm' to the purposes of the Cambridge Green Belt (LUC 2021).

According to current National and Local planning policy, the CWWTPR constitutes inappropriate development in the Green Belt, by definition it would be harmful to it and there is a presumption against it (SCDC 2018; NPPF 2021). The NPSWW states that the decision maker will attach substantial weight to the harm to the Green Belt when considering any application for such development (NPSWW 2012).

It is believed that the harm to the purposes of the Cambridge Green Belt as a result of the proposal by AW to relocate to the selected site between Fen Ditton and Horningsea is not outweighed by the 'benefits' or 'other considerations' put forward by AW and that it does not meet the 'very special circumstances' required to qualify the proposal for development.

2.0 Very Special Circumstances

AW proposes a number of benefits to be taken into account when considering the balance between harm to the Cambridge Green Belt and benefits. However, these are not as clear cut, sustainable and or as critical to Local Planning Policy as portrayed by AW in the Planning Statement (AW 7.5).

2.1 Local Planning

Greater Cambridge Partnership (GCP) has been working in partnership with Anglian Water to pursue the planning objectives of a full build out at North East Cambridge in the order of 8,350 homes and facilitate AW's progression through the DCO process. The approach taken by GCP to progress the planning objectives for North East Cambridge to their current stage as promoted by AW in the Planning Statement (AW 7.5) has raised criticism including a lack of transparency in the local planning consultation process.

Despite opportunities for mixed development without the relocation of the existing WWTW being identified in a spatial options review informing the existing Local Plan (SCDC CNFE 2014), no alternative to a full build out at North East Cambridge has been provided for consultation in the emerging Local Planning process or North East Cambridge Area Action Plan (GCP ELP 2021; NECAAP 2020); alternatives to a full build have been dismissed as 'not viable'. As referenced in the Planning

Statement (AW 7.5) the viability here relates to the number of homes required to qualify for the HIF funding to relocate the WWTW, not the viability of an alternative mixed development of a smaller quantum of housing and equal employment growth opportunities without a relocation as identified in the preparation of the existing Local Plan (SCDC CNFE 2014).

No reference has been made in the local planning documents to the site area selected by AW for the PD or that it is in open Green Belt within 1 mile of the existing WWTW, this information has been excluded from the consultation process.

Critically, there has been no sustainability assessment at a local level to test the consequences of pursuing the planning objectives of a full build out against local policy including the carbon cost and cost to the public purse, from which the public and representative council members can make a judgement on the development plans proposed and, or compare with an alternative that does not require a relocation of the WWTW and subsequent environmental consequences.

The absence of reference to the consequences of GCP pursuing the singular planning objectives for North East Cambridge has raised questions about the transparency of the GCP local planning process. In response GCP has asserted that the relocation is in fact 'not a requirement of the emerging Local Plan or NECAAP' but that 'both plans are being prepared on the basis that the CWWTW will be relocated'(SCDC CM 2022); the consideration and assessment of the environmental consequences have been deferred wholly to the DCO process and the consideration of an alternative housing plan until after its completion if it is not successful.

In response to AW referencing 'the requirement of a relocation of the WWTW for GCP to fulfil its planning objectives, GCP clarified in the AW Stage 3 Consultation response that:

"Both plans [emerging Local Plan and North East Area Action Plan] are therefore currently being prepared on the basis that the CWWTW will be relocated but this relocation is not a policy requirement of either plan.if the DCO is not approved that will clearly lead to the need to reconsider and amend the plans ." pg. 6. (SCDC 2022).

Consequently, the progression of the Local Plans demonstrating support for a relocation as reported by AW in the Planning Statement (AW 7.5) are founded on potential i.e. 'if the development opportunity should arise'. The AW proposal is not a case of need, it does not reflect local community, stakeholder or council member opinion on the environmental consequences of GCP pursuing the planning objectives or any consideration of a reasoned alternative to fulfil housing requirements of the emerging Local Plan without a relocation of the WWTW within the planning process.

2.2 Alternatives

Contrary to the needs case presented by AW in the Planning Statement (AW 7.5 at 2.1) it is believed alternative and compatible sustainable allocations are available to GCP to fulfil the housing requirement as specified within the emerging Local Plan (GC ELP FP 2021) without the need to identify any new strategic sites, use of greenfield or green belt above that already in plan or proposed.

GCP emerging Local Plan First Proposals was published in 2021 . The Housing trajectory figures and the requirement of the total number of homes to be built within Greater Cambridge was based on a calculation described as Medium Plus (+). This calculation allowed for an employment to housing ratio of 1:1 above the number of homes calculated using the 'standard medium method' to produce a figure of 44,400 new homes required for the period 2020-2041, inclusive of a 10% buffer the number required was calculated as 48,840 (GC ELP FP 2021).

The Housing Delivery Study (2021) supporting the First Proposals concluded that delivery at a calculated maximum growth scenario would not be achievable but there was scope to deliver the medium + scenario. Subsequently, allocations within the First Proposals, including those to North East Cambridge (NEC) were managed to meet this target number .

The supply of the majority of homes amongst the allocation in the emerging Local Plan First Proposals had been established in the existing Local Plan (2018) in response to the housing and employment growth targets of the Greater Cambridge City Deal. A requirement of 33,500 (37,000 incl. 10% buffer) new homes in the plan period to 2030 was established and managed principally across existing and new large site allocations including: Cambourne; Waterbeach New Town; Bourn and Northstowe. Housing development is well underway within Greater Cambridge to deliver these new homes, and land supply reported in April 2023 to be exceeding growth targets in the order of 4,450 homes at 2031 and a prediction of 1,000 additional homes at 2041 (GC HT 5yr Land Supply 2023).

To satisfy the total housing requirement of 48,840 to 2041, The Greater Cambridge First Proposals (GC ELP FP 2021) identified the need for a further 11,640 homes (incl. 10% buffer). An additional two new sites have been proposed, S/CE, Cambridge Airport on safeguarded land for housing identified in the existing Local Plan (2018) and S/NEC, North East Cambridge with the 'amount of development being subject to the relocation of the WWTW' and as referenced by AW in the Planning Statement (AW 7.5) the 'successful implementation of the North East Cambridge Trip Budget trip budge.' (GC ELP FP 2021).

The existing sites above, Waterbeach, Bourn and Northstowe will provide in the order of 11,000 legacy homes beyond the Emerging Local Plan period post 2041 (GC HT 5yr.LS 2023). An additional 4,000 legacy homes are identified for build out at Cambridge Airport post 2041 (S/CE) (GC Development Strategy 2021) and more will arise, and yet to be identified, from a new 'strategic scale development' at Cambourne ; the intention to progress this has been confirmed in the GC ELP Strategy Development Up-date (GC ELP DSU2023). This amounts to the availability of 15,000+ homes post 2041.

As presented in AW Planning Statement (AW 7.5) 8,350 homes have been identified for potential development at NEC within a 20 year period. In the event of the WWTW relocating, and the trip budget being satisfied, the emerging Local Plan has allocated 3,900 homes at NEC for build out within the plan period to 2041; 650 of these are for delivery before 2030 and are not dependent on a relocation of the WWTW (GC Development Strategy 2021) and 4,450 for build out beyond the plan period post 2041.

Subsequently, a relocation of the WWTW would enable the building of 3,250 homes within the emerging Local Plan period to 2041 at NEC representing just 7% of the housing requirement established as deliverable in the Housing Delivery Study (2021).

It is proposed here that these 3,250 homes could be reallocated amongst existing and new sites proposed within the emerging Local Plan period to 2041 without the need to identify any new strategic sites, use of Greenfield or Green Belt above that already in plan or proposed.

Further, it is evident the number of legacy homes, in excess of 15,000 as outline above, is more than sufficient without a requirement of an additional 4,450 homes identified for NEC for planning purposes beyond the emerging plan period post 2041.

The proposal here that 3,250 homes could be reallocated amongst existing and new sites already proposed is supported by: the strength of the current housing delivery figures outlined above that could enable more adopted allocations to come forward into the plan period; advanced planning now established for Cambridge Airport that may enable a larger allocation of homes for delivery in the plan period than so far calculated; proposed new homes yet to be quantified amongst a mixed development at the Cambridge Bio-Medical Campus and anticipated within the plan period; a proposed new strategic level of development at Cambourne now confirmed, housing numbers yet to be quantified ; homes as part of a mixed development at North East Cambridge without a relocation of the WWTW, 650 have been put forward by GCP as above on the basis of existing planning applications, the full potential housing numbers have to-date not been quantified.

In the context of the sustainability criteria of housing development at North East Cambridge promoted by AW in the Planning Statement (AW 7.5) other new sites including for example, Cambridge Airport and 'new settlements' were all found to perform well and comparable on the premise of transport infrastructure being integral to the development and the distinguishing factor in sustainability amongst housing developments (GCP DSO 2020).

It is noted the GC Local Plan Development Strategy Update published this year using the same methodology of 1:1 employment to housing ratio above the standard method, has identified an additional requirement of 7,000 homes in the plan period to 2041 (GC LP DSU 2023). The GC LP DSU based on the delivery assumptions set out in the Housing Delivery Study (2021) has identified that any delivery over and above growth levels established in the emerging Local Plan in 2021 would require a stepped approach, delivering a higher number of homes in the plan period in excess of what is currently planned and levels of growth above historical annual housing completion rates.

Subsequently, these most recent objectively assessed housing figures are yet to be identified as sustainable or attainable within the plan period. Currently, GCP anticipate that in the context of water supply and housing delivery (market absorption and build out potential) that it 'may not be possible or appropriate to meet the new objectively assessed housing need in full.'(3.24 GC LP DSU 2023).

Thus, sustainability factors identified to meet any additional housing need in the plan period to 2041 above that identified as deliverable in the emerging Local Plan First Proposals (GC ELP FP 2021) are independent of any housing allocation at North East Cambridge and a relocation of the existing WWTW. The proposal that the 3,250 homes allocated for North East Cambridge in the emerging Plan

Period could be redistributed as an alternative amongst existing and proposed new sites as outline above is not affected by these more recent housing requirement figures.

2.3 North East Cambridge

As referenced in the Planning Statement (AW 7.5), the HIF award to fund a relocation of the WWTW is secured on the premise of 8,350 homes proposed to be achievable at North East Cambridge (NECAAP).

There are however significant risk factors relating to the viability of NECAAP and a housing development on the scale proposed. These include financial risks, arising from inflationary cost pressures relating to the cost of the relocation and development costs on the core site, and 'transport risks' relating to the requirement of no increase in a pre-determined trip-budget (as referenced in AW 7.5) requiring adherence through construction and residential occupation (NECCSU 2023). Despite determination for the proposed development to be of 'non-car use' transport modelling has yet to demonstrate the trip budget will be attainable.

These risk factors and associated concerns about the viability of delivering this number of homes at North East Cambridge has been raised by developers as feedback in the emerging Local Plan consultation. Developers identified the cost to prepare the site, decontamination, removal of plant etc. over and above the cost of development at other large strategic sites as a viability factor as well as the number of land owners involved (S/NEC GC FP ELP 2021) For example, :

Hill Residential Ltd and Chivers Farms (Hardington) LLP 13/12/2021

"This site is subject to significant constraints. We consider that the Councils should review both the overall quantum of residential development to be allocated to the NECAAP Area and the ability of the site to deliver within the Local Plan Period to 2041." S/NEC 13/12/2021 (GC ELP FP 2021)

The number of homes on the combined site areas will require housing at high density levels unprecedented for Cambridge. This has raised concerns within the public consultation process in particular with regard to: the lack of green infrastructure (GI); a reliance on existing landscaped areas within the Business Park to satisfy GCP's own policies on the minimum provision of GI; the impact on existing GI within the vicinity of the site area already under pressure; the lack of outdoor or indoor sports provision requiring travel outside of the area to access a swimming pool or formal sports pitches etc. Council members, the public and bodies including the Wildlife Trust; National Trust; Cambridge Past, Present and Future have raised significant concerns over these matters throughout the consultation process and they are yet to be resolved (GC ELP FP 2021; SCDC CM 2022b).

It is evident there are risks and difficulties associated with the scale of the housing numbers proposed at North East Cambridge. Despite these, GCP has continued to 'stick to the numbers'. As indicated in the Planning Statement (AW 7.5) the housing numbers are not being reduced or alternatives considered in order to fulfil the qualification for the HIF funding over and above any other factors. Anything other than a full build out will not qualify for HIF funding and a relocation of

the WWTW is dependent on the funding. This status does not however exclude sustainable alternatives being available for GCP to put into their development plans.

It is of note HD Planning Ltd, in their consultation feedback to the emerging Local Plan and housing proposals for North East Cambridge raise the matter of robustness of the proposed plans in the context of examination:

“We question the deliverability and viability of 4,000 homes being delivered from this allocation within the plan period given the reliance on the relocation of the sewage treatment works and also the remediation which will be required as part of any development proposal. This allocation may cause the plan to be vulnerable to challenge at Examination stage.” S/NEC 10/12/2021 (GC ELP FP 2021)

2.4 Employment

Anglian Water promote the benefit of a growth of 15,000 jobs at North East Cambridge should the relocation be permitted (AW 7.5). However, these employment growth targets have been identified as attainable at North East Cambridge by the Local Planning Authority in preparation for the existing Local Plan without a relocation of the Waste Water Treatment Works (SCDC CNFE 2014) and would not therefore be directly attributable to a relocation.

2.5 Sustainability

a) Brownfield Site

AW promote the use of a Brownfield Site for housing as reducing pressure on other parts of Greater Cambridgeshire (AW 7.5 at 2.1). However, this belies the fact that in order to release the land for housing, the proposal is to relocate a large industrial plant in open and otherwise undeveloped Green Belt causing substantial harm to the purposes of the Cambridge Green Belt and in conflict with National and Local Planning Policy. Given there is no operational requirement for the relocation of the WWTW and it is being pursued on the basis of housing, the relocation is in effect building homes in the Green Belt neutralising any benefit claimed to the release of brownfield.

Further, as above, sustainable alternatives to fulfil the housing requirement within Greater Cambridgeshire without additional need for new sites to those already adopted or proposed are believed to be available to GCP.

b) Most Sustainable Location

AW promote the proposed housing development at North East Cambridge as being ‘recognised as the most sustainable location suitable and available (subject to the CWWTP DCO being approved) in Greater Cambridge to meet housing needs.’ (AW 7.5 at 2.1.3).

However, the sustainability factor here is very limited and is based on the Sustainability Assessment supporting the emerging Local Plan that identified that carbon emissions arising from transport are ‘the most significant with regard to the location and distribution of growth.’ (GCP DSO 2020). In this

case, an urban development within close proximity to employment and good public transport networks is more sustainable than a rural location with poor public transport networks.

Other sites including for example, Cambridge Airport and 'new settlements' were all found to perform well and comparable on the premise of transport infrastructure being integral to the development (GCP DSO 2020).

Further, the sustainability credentials promoted above other sites does not take into consideration the environmental cost of decommissioning a fully operational and future proofed WWTW with future growth potential; the building of a new facility within 1 mile of the existing requiring further development in the event of additional long term growth requirements; the carbon emissions and financial resources required to prepare the site for housing development; the cost to the public purse to in effect build 3, 250 homes in the emerging plan period to 2041. All of which are extensive.

2.6 Capacity

Anglian Water promote the benefit of increased efficiency, improved water quality and capacity should the relocation be permitted (AW 7.5). However, whilst it is the case that building a new plant will bring these benefits, as increasing environmental standards are required of Anglian Water the upgrading of operations would expect to be made at the existing CWWTP without the use of public expenditure, in this case, Government Housing Infrastructure Funding.

Following a £21 million up-grade in 2014-15, the existing CWWTP was heralded as not only future proofing the site to serve Cambridge residents for decades to come but also securing the plant's standing as 'the eastern region's green energy generating giant' (Envir. Journal 2016).

The plant was significantly reduced in size as a result of efficiencies in the up-grade determining there is capacity for future growth within the site area should it be required ; Anglian Water have not specified at any time that further capacity is required on the existing site including the additional management of Waterbeach New Town.

Pumping directly from Waterbeach New Town to the existing WWTW has been presented by Anglian Water as an alternative solution to the building of a new facility at Waterbeach with significant benefits, ' including embedded carbon reductions and operational efficiency' (Anglian Water 2020 Section 35). The requirement as indicated in the Planning Statement (AW 7.5) of additional capacity to accommodate Waterbeach Newtown as a 'function of the proposed relocation' is not evidenced in the context of a need for increased capacity.

The application for government HIF funding in 2018 made it clear that a relocation would be dependent on external funding as there was 'no operational requirement for a relocation' (HIF 2018). This application was in the knowledge of the Greater Cambridge housing growth trajectory as identified in the existing Local Plan including Waterbeach New Town(SCDC 2018) ; in the event of building a new WWTW at Waterbeach, it would have remained the case that solids would be transported in from Waterbeach for processing at the existing Cambridge combined WWTW.

It is believed the 'increased capacity' needs case as promoted by AW in the Planning Statement (AW 7.5) does not reflect the capacity at the existing WWTW or potential to increase capacity at a later

stage should the need arise; the current capacity and future development potential at the existing WWTW should be clarified.

3.0 Cumulative Impact

The Cumulative Impact assessment undertaken by AW (5.2.21) does not appear to have considered cumulative impact on the Cambridge Green Belt or Historic Environment each of which are considered relevant here to the impact of the PD.

There will be cumulative negative impact on the Cambridge Green Belt in the context of the number of designated sites and features impacted as a result of a permanent negative change in landscape, character, place and setting visible to 5km including: Green Belt villages, conservation areas, multiple historical assets, footpaths and bridleways; strategic Green Infrastructure; Local Character Area.

There will be cumulative loss of area and quality of Green Belt around the conservation area and historic village of Fen Ditton; identified as one of three innermost villages to Cambridge and, as a result of boundary change to accommodate housing development on the edge of Cambridge to the south east of the village in previous Local Plans, the remaining Green Belt is noted as of high value 2.54 (CCC LP 2018).

The proposed relocation will introduce an industrial landscape to the north of Fen Ditton Conservation Area and would enable significant high density housing development in the order of 8,350 homes to the west (NECAAP). The new developments will be visible from within the Fen Ditton conservation area, on approach to the surrounding villages of Fen Ditton, Horningsea and Stow cum Quy and associated historical assets impacting significantly on character, place and setting.

The result would be a cumulative negative impact on the protected characteristics of the Cambridge Green Belt including the River Cam corridor, riverside meadows and footpaths identified in the Cambridge Inner Green Belt study (SCDC GB 2015) of particular importance contributing to the 'special qualities' of the green corridor into Cambridge City (**Map showing Cumulative Impact to be provided**).

4.0 Mitigation

As identified in the Landscape Character Assessment (LCA) mitigation measures will produce a new landscape out of character with the existing LCA (AW 5.2.15). The woodland planting will blunt previously open uninterrupted long distant views and the industrial plant will be visible both amongst and above tree cluster and hedge planting on the top of a 5m earthwork bank. The success of any screening effect into the long term will be dependent on the viability of planting measures of which no certainty can be provided.

5.0 Conclusion

The PD will give rise to substantial harm to the purposes of the Cambridge Green Belt.

Mitigation measures will provide screening in the immediate area but will introduce a new wooded landscape out of character with the existing open fen landscape and will truncate distant views. The industrial plant will remain visible amongst and above hedging and a clustered tree line at 15 years

from around the wide perimeter of the core site area. Planted screening measures will be less effective in winter months. The success of any screening effect into the long term will be dependent on the viability of planting measures of which no certainty can be provided.

The scale of development and level of housing density proposed at North East Cambridge is controversial and a number of factors are yet to be resolved to determine a viable development scheme.

As indicated in the Planning Statement, having secured HIF funding to enable a relocation of the WWTW, GCP have bound themselves to the housing commitments proposed, anything other than a 'full build out' has not been considered viable or put out to public consultation or council member voting.

It appears GCP have turned a blind eye to the consequences of pursuing their planning objectives for a 'full build out' despite the risk factors associated with house building on the scale and density proposed and the environmental costs of the decommissioning and relocation of a fully operational and future proofed existing WWTW into high quality open Green Belt. The consequences of the planning objectives have not been tested against local planning policy or presented to the public or representative council members.

The extent and manner in which GCP have pursued their planning objectives for North East Cambridge without reference to the environmental consequences, or presentation of alternatives for consultation at a local level, has raised concerns about the transparency of the local planning process and integrity of the stage of the Local Plans as promoted by AW as evidence of the commitment of the local planning authorities.

GCP have since clarified that a relocation of the WWTW is not a requirement of the local plans, though they have been developed on the premise of a relocation and that if the DCO is unsuccessful then the plans will be reconsidered and amended.

It is believed sustainable alternatives can be found to accommodate the housing proposed for North East Cambridge both within the emerging Local Plan period to 2041 and beyond without the requirement of additional new strategic sites above those already in plan and or proposed.

AW promote employment benefits and the sustainability credentials of building homes at North East Cambridge over and above other sites in Greater Cambridgeshire. However, the employment numbers proposed are matched to those identified as attainable in the preparation of the existing Local Plans without a relocation of the WWTW and other strategic sites with integral public transport strategies were found to be compatible to North East Cambridge against the sustainability criteria.

The promotion by AW of the use of Brownfield to build homes is negated on the basis that to do so requires building an industrial plant that does not require replacement into open Green Belt.

AW indicate increased capacity will be a function of the relocation, however it is understood there is sufficient capacity at the existing WWTW to at least accommodate the population trajectory over the next few decades and that there is also room for expansion. It is recommended capacity factors of the existing WWTW are clarified.

In considering cumulative impact of the PD, AW do not appear to have considered the Cambridge Green Belt or designated assets including the historic environment all of which are relevant. The proposed relocation will introduce an industrial landscape to the north of Fen Ditton Conservation Area and would enable significant high density housing development in the order of 8,350 homes to the west (NECAAP) impacting riverside meadows and footpaths. This is in the context of recent Green Belt release to the south east of Fen Ditton to accommodate housing development and in being one of the innermost villages to Cambridge, the identification of the remaining Green Belt surrounding the village of high value.

According to current National and Local planning policy, the PD constitutes inappropriate development in the Green Belt, by definition it would be harmful to it and there is a presumption against it. The NPSWW states that the decision maker will attach substantial weight to the harm to the Green Belt when considering any application for such development.

Neither the requirement nor the benefits of a relocation of the WWTW as proposed are as clear cut as AW present in their Planning Statement. It is proposed here that the benefits are not sufficient to offset harm to the Green Belt and that public funding being available to relocate the existing WWTW is not qualification to support a planning application that is contrary to local and national planning policy when sustainable alternatives exist.

References

NPPF 2012 [National Planning Policy Framework](#)

GCP ELP 2021 [GCP first proposals November 2021](#)

SCDC GB 2015 [SCDC Joint Cambridge Inner Green Belt Boundary Study 2015](#)

LUC 2021 [Green Belt Study GCLP 2021](#)

SCDC 2018 [South-Cambridgeshire-Adopted-Local-Plan-2018](#)

NPSWW 2012 [National-Policy-Statement-for-Waste-Water 2012](#)

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SCDC 2022 SCDC Cambridge Waste Water Treatment Plant Relocation (CWWTPR) Phase 3 Consultation Response 27/04/2022

GC HT 5yr LS 2023 [GC HT 5ys Land Supply \(LS\) 2023](#)

GC DS 2021 [GC Topic Paper Development Strategy 2021](#)

GC ELP DSU 2023 [GC Development Strategy Up-date \(Reg 18 Preferred Options 2023\)](#)

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GC Housing Delivery Study 2021 [GC Housing Delivery Study 2021](#)

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HIF 2018 HIFF Business Case - Application (FOI source GCSP)

CCC LP 2018 [Cambridge City Council Adopted Local Plan 2018](#)