

Cambridge City Council

Written Representations

**Application by Anglian Water Limited for an Order Granting
Development Consent for the Cambridge Waste Water Treatment
Plant Relocation project (CWWTPR) (ref: WW010003)**

Deadline 1

20th November 2023





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1. Introduction

- 1.1 This document sets out Cambridge City Council's (CCC) Written Representation (WR) on the application by Anglian Water (AW) for a Development Consent Order (DCO) on land at located south of Horningsea with the A14 on its southern boundary.
- 1.2 The following representation is made on behalf of Cambridge City Council only which hereafter is referred to as the 'City Council' (or CCC). It is proposed that the City Council will make separate representations and submissions to the Examining Authority ('the ExA') in respect of the above referenced application (the DCO application') to its fellow authority South Cambridgeshire District Council (SCDC).
- 1.3 The City Council has previously submitted Relevant Representations (RRs) which this WR seeks to supplement. The City Council notes that additional information has been submitted by the Applicant to the ExA and this has been considered as part of the Local Impact Report (LIR). The LIR should be read in conjunction with the previously submitted RRs, this WR and the responses to the ExA's Written Questions and Requests for information (ExQ1).
- 1.4 Below is a summary of the key issues that the City Council would like to highlight.

2. Summary of Key Issues

- 2.1 Based on the assessment in the LIR short term negative social and environmental impacts anticipated during the construction phase of the proposed development have been identified. Such impacts include increased traffic generation, construction disturbance and diversions for pedestrians, cyclists and motorists. Longer term residual impacts include harm of the openness of the Green Belt site and surrounding landscape character, adverse harm to the significance of heritage assets and the potential for noise and odour impacts.
- 2.2 The LIR makes clear that the City Council is not the Waste Local Planning Authority, and it can therefore not make any proposals for waste within its emerging plans. The County Council is the waste local planning authority and therefore any proposals for relocation of the CWWTP if they came forward under the Town and Country Planning Act 1990 would be a matter for their

determination applying the Minerals and Waste Local Plan 2021. Policy 11 of the Minerals and Waste Local Plan 2021 in particular provides criteria for determining such proposals and states that relocation of such facilities “*will be supported in principle, particularly where it is required to meet wider growth proposals identified in the Development Plan*”.

- 2.3 It has been demonstrated, through the LIR, that the positive benefits that would arise, most notably in respect of the substantial economic, environmental and social benefits to the locality and the region would be substantial. Greater Cambridge has a strong and nationally important economy. It is recognised as one of the most important research and innovation-led employment hubs for the UK. The evidence supporting the emerging GCLP concludes that the economy is forecast to continue growing strongly and that housing need to support the economy is well above the government minimum standard method.
- 2.4 The Secretary of State for Levelling Up, Housing and Communities has referred specifically to “*ambitious plans*” for Cambridge to be “*supercharged as Europe’s science capital*” and that “Cambridge City Council, Anglian Water, Land Securities PLC and Homes England will work together to accelerate the relocation of water treatment works in Northeast Cambridge (subject to planning permission), unlocking an entire new City quarter – delivering approaching 6,000 sustainable well-designed homes in thriving neighbourhoods – as well as schools, parks and over 1 million square feet of much needed commercial life science research space.”
- 2.5 The HIF funding provides a once in a generation opportunity to address the viability issue that has prevented regeneration of the North East Cambridge for decades. There is very limited potential for regeneration of the CWWTP site and surrounding area of North East Cambridge Area without the relocation of the CWWTP.
- 2.6 The release of the CWWTP cannot be assumed as the basis for a deliverable plan or plan policy until Anglian Water has the means to relocate. The available evidence, as detailed in Topic 6 of the LIR, also shows that the NEC area is the clear preferred option in terms of location for strategic scale growth in Greater Cambridge, and the NECAAP demonstrates the scale of growth that would be enabled by the relocation of the CWWTP is considerable. Given that the HIF funding addresses the viability constraint that has long prevented the delivery of regeneration of this highly sustainable site, subject to the delivery of substantial housing on the site, there is no justification to consider alternative options, beyond the process that informed the GCLP Preferred Options, until the outcome of the DCO is known.

- 2.7 The LIR highlights Cambridge City Council's and South Cambridgeshire District Council's shared long-held ambition to regenerate the part of the city within which the existing CWWTP is located. Both emerging plans are clear that they are predicated on the relocation of the CWWTP taking place. The interdependence between the DCO process and the development plan process in so far as it relates to proposed redevelopment of the site has been narrated and explained as part of this report. In particular, the NECAAP and the emerging GCLP cannot progress to the Regulation 19 Proposed Submission Draft stage consultation unless and until the DCO is approved, in order to provide evidence that the plan strategy can be delivered. As such it is crucial to recognise the interdependence between the two processes, notwithstanding that they properly follow their own separate legislative processes.
- 2.8 There is clear evidence through the emerging plan making processes of the significant benefits that would be enabled by the relocation of the Cambridge Waste Water Treatment Plant (the CWWTP site) and the extensive area of surrounding, underutilised, previously developed land, where regeneration potential has been effectively sterilised.

3. Conclusion

- 3.1 The City Council's position has been clearly outlined in the submitted RRs, the LIR, this WR and the responses to the ExA's Written Questions.