



The countryside charity  
Cambridgeshire  
and Peterborough

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20th November 2023

Letter submitted by upload to:

<https://infrastructure.planninginspectorate.gov.uk/projects/ea/stern/cambridge-waste-water-treatment-plant-relocation/>

Dear Sir/Madam,

**Ref: WW010003 Application by Anglian Water Services for an Order Granting Development Consent for the Cambridge Waste Water Treatment Plan Relocation**

CPRE is the national countryside charity which campaigns to protect Green Belts and prevent urban sprawl. Our remit is also to protect and enhance greenfield land, natural landscape, rural villages and to campaign on local and national planning issues where potential for harm is perceived.

CPRE Cambridgeshire and Peterborough, (CPRE in this letter) has previously responded to consultations regarding this matter, the last one being to Anglian Water's Phase 3 Consultation on 27<sup>th</sup> April 2022.

The purpose of this letter is to summarise CPRE's objections to this application and to confirm the points raised by CPRE during the Inquiry sessions. Other issues have arisen since those sessions and, additionally, CPRE has included comments on those issues here too.

CPRE Cambridgeshire and Peterborough strongly objects to the Anglian Water proposal to relocate the Cambridge Waste Water Treatment Plant (CWWTP) from its present site at Milton to Honey Hill in the Cambridge Green Belt for the following outline reasons. More detailed information will be provided in due course.

**Cambridge Green Belt**

1. Currently, the CWWTP is located in an industrial and commercial area of north Cambridge. The proposed move will significantly industrialise an extensive, unspoilt, rural area of the Cambridge Green Belt. CPRE is very concerned by the visual impact of the large CWWTP industrial buildings and plant being located so close to the characteristic Fen Edge villages of Horningsea and Fen Ditton. We are concerned that this move will set a precedent and make it difficult to resist other industrial development in the Green Belt north of the A14 around Cambridge.
2. The Cambridge Green Belt is one of, if not, the smallest statutory Green Belt in England. Unlike other Green Belts whose purpose is solely to protect against urban sprawl, the Cambridge Green Belt has a second declared purpose and that is to protect the setting and sense of place of the City of Cambridge. The Cambridge Green Belt is already under significant attack, not least from Cambridge University and its colleges. Consequently, significant parts of the Green Belt in the north, the west and the south have already been lost to over-development. To date, the A14 has served as some form of barrier to development to the north of the City and CPRE fears that if this proposal proceeds it will become even more difficult to protect the delicate Fen Edge countryside from further, unnecessary, over-development and sprawl.

**National Planning Policy**

3. The National Planning Policy Framework (NPPF) Section 13, indicates the obligation to protect Green Belt land. Paragraph 137, states "*Before concluding that exceptional circumstances exist to*

*justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:” “makes as much use as possible of suitable brownfield sites and underutilised land”.*

4. Relocation of the CWWTP would not be compliant with the NPPF because Anglian Water has publicly stated that the existing CWWTP has sufficient capacity to meet the needs of the Cambridge area it serves, including planned expansion, until 2050. It has also been demonstrated that a modernised CWWTP utilising latest technology could be built on the existing Anglian Water site if increased capacity should be required.
5. The modified size and scale of the proposed CWWTP, including the stacks, will be highly intrusive on the local Fen Edge landscape and provide a potential bridge for further development and the urban and industrial sprawl into the surrounding countryside that the Cambridge Greenbelt was designed to prevent.
6. As stated above, the Cambridge Green Belt was also designed to maintain the sense of place and the setting of the City of Cambridge as well as the identities of the necklace of villages around the city, which are characteristic of the South Cambridgeshire District. CPRE fears that current development pressures are such that the whole of South Cambridgeshire is at risk of transitioning from a primarily rural area into a primarily urban one.

NPPF Paragraph 133, states: *“The Government attaches great importance to Green Belts. The fundamental aim of Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*

NPPF Paragraph 134, states: *“Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up area b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

#### **Local Planning Policy**

7. Greenbelt Policy S/4 of the South Cambridgeshire District Council (SCDC) adopted Local Plan 2018, Chapter 2, Spatial Strategy states as follows:

*“Cambridge Green Belt. A Green Belt will be maintained around Cambridge that will define the extent of the urban area. The detailed boundaries of the Green Belt in South Cambridgeshire are defined on the Policies Map, which includes some minor revisions to the inner boundary of the Green Belt around Cambridge and to the boundaries around some inset villages. New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework paragraphs 31 and 32.”*

This Policy S/4 provides further evidence of the importance of maintaining the Cambridge Green Belt. Furthermore, the City of Cambridge adopted Local Plan Spatial Strategy Policy 4, Cambridge Green Belt, paragraphs 2.51-2.58 reflect the District Council’s Green Belt Policy S/4.

#### **Protected Sites and Projected Wildlife Improvement Plans**

8. CPRE has obtained records and maps from the Cambridgeshire and Peterborough Environmental Records Centre. These documents show important areas pertaining to County wildlife sites, areas of Sites of Special Scientific Interest (SSSI) and recorded sightings of wildlife, including threatened species, across many sites.

CPRE is of the opinion that the proposed development will cause harm to some of the areas of protection and to those currently not protected but recording significant wildlife activity and importance. Damage to or interference with these sites would not represent compliance with stated biodiversity net gain objectives. These objectives could not be satisfactorily complied with by off-setting because of the importance of locale to these sites and to the species they host.

9. The Honey Hill site falls within the National Trust's iconic Wicken Fen Vision. Wicken Fen is a designated SSSI. It is a National Nature Reserve and a Nature Conservation Review site. It is also a designated RAMSAR wetland site of international importance and part of the Fenland Special Area of Conservation under the Habitats Directive. The Wicken Fen Vision is to extend the protected fen from Wicken to Cambridge. The Vision is an important initiative to protect the fenland countryside, to encourage its biodiversity and to provide a place for people to access for recreation and leisure which is large enough that their presence will not discourage the flora or the fauna. CPRE believes the Wicken Fen Vision to be of major local and national importance and that placing a major industrial plant within its boundaries is totally unacceptable.
10. Understanding of the importance of access to green space to physical and mental health has grown in the light of lifestyle changes that came about for many during the COVID-19 pandemic. The effects of economic and housing growth in the City of Cambridge and South Cambridgeshire where accessible, informal, green space is already at a premium, means that delivery of the Wicken Fen Vision, without it being compromised by the large industrial area that will be created by this proposal, is of growing importance to the health and wellbeing of Cambridge residents. It is also much needed to prevent the over-use of other green spaces near the city.

#### **Best and Most Versatile Agricultural Land**

11. Much of the Green Belt land within the proposed site is Grade 2 and 3a, best and most versatile, agricultural land. This factor appears to not have been a consideration in proposing this development. Significant weight is given to protecting such land from development by the NPPF, paragraphs 170 and 171, note 53.

12. In 2019, the Environmental Audit Committee of Parliament warned the UK government that it must reduce dependence on imported foods because climate change will reduce their availability.

<https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/1803/180302.htm>

This warning was repeated in the UK Food Security Report 2021 issued by DEFRA in May 2022 along with much other data.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1041623/United\\_Kingdom\\_Food\\_Security\\_Report\\_2021\\_16dec2021b.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1041623/United_Kingdom_Food_Security_Report_2021_16dec2021b.pdf)

In summer of 2022, much of the UK and especially the "food-bowl" of East Anglia experienced significant drought from which it is only just recovering over a year later.

The latest Drought Report confirming recovery from the 2022 drought was delivered to us by email from the Environment Agency this morning.

Other parts of the world which supply the UK with food have variously experienced and are experiencing both extreme flooding and extreme heat. The effects on UK fresh food supply have already been seen with both availability and prices badly affected.

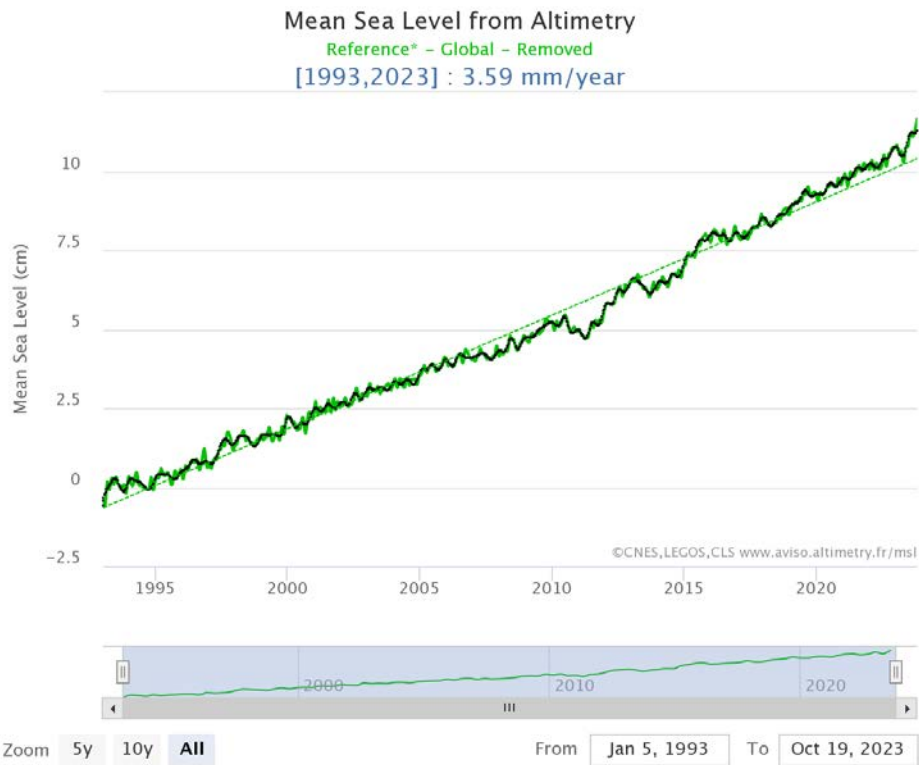
In the interest of national food supply, CPRE consider it even more important to protect all good crop growing land from development, especially best and most versatile land. South Cambridgeshire is part of the largest area of Grade 2 land in this country. It therefore must be protected and this imperative is amplified by growing flood risk to Grade 1 land.

#### **Relevant Effects of Increasing Flood Risk**

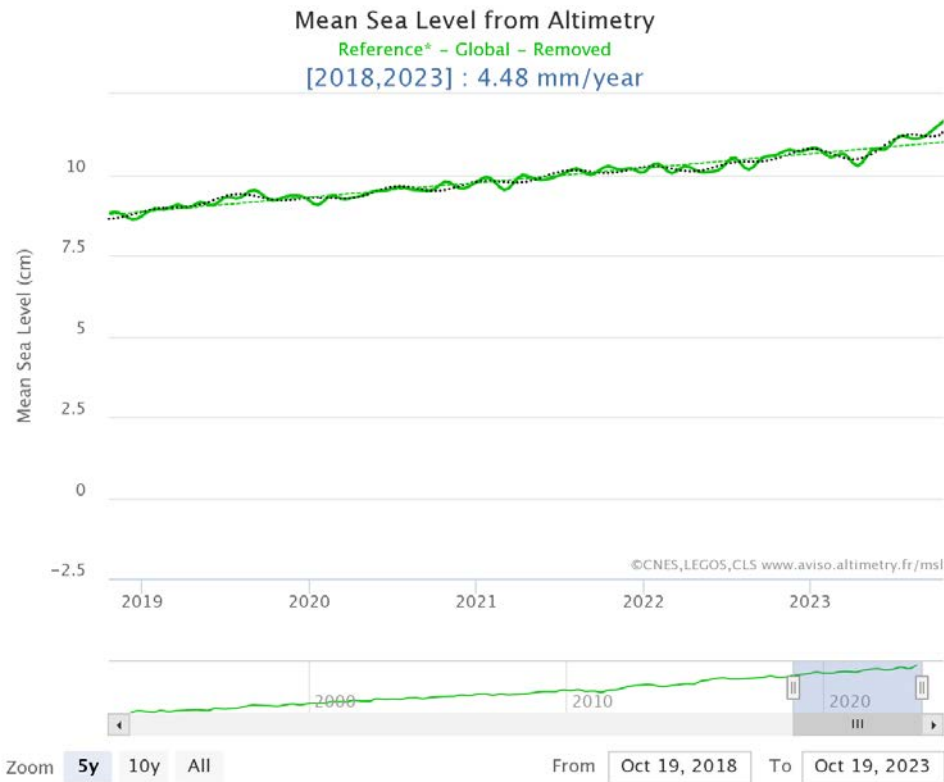
13. Due to climate change, large areas of Grade 1 best and most versatile land in the Fens are under increasing threat of both fluvial and tidal flooding. In the latter case, due to the presence of nematodes in seawater, Fen farmland that is flooded will often result in no or reduced crop yields for up to seven years as happened after the 1947 and 1953 floods. This increases the importance of protecting remaining areas of best and most versatile land outside of the Fens.
14. Moreover, the annual rate of global sea level rise is steadily increasing. It increased from 3mm per year in 2014 to 3.3mm per year in 2023, according to IPCC 2014 and 2019 respectively.

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15. Realtime satellite monitoring shows that rate of sea level rise continues to increase inexorably. Averaged over 30 years it is 3.59 mm per year today.



Averaged over 5 years it is 4.48 mm per year.



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16. The Cam-Ouse catchment is protected from flooding by the South Bank of the Great Ouse which is tidal up to Brownhill Staunch above Earith. The South Bank offers protection only from "1 in 80"-year events and, although not expert, it is our perception that the increasing sea level height will put large areas of the catchment, including parts of North Cambridge and the City centre, at increased risk of flooding. This is a situation that is being exacerbated by excessive development around Cambridge.

17. Current estimates of sea level rise used for planning purposes do not consider the now accelerating melt rate of the Greenland ice sheet leading to an estimated additional 10 inches of sea level rise, as recently announced by researchers here:

<https://theconversation.com/whats-going-on-with-the-greenland-ice-sheet-its-losing-ice-faster-than-forecast-and-now-irreversibly-committed-to-at-least-10-inches-of-sea-level-rise-185590>

or potential sudden occurrences caused by sudden glacial collapse, such as the increasing risk of the collapse of the Thwaites glacier in the Antarctic, leading to an estimate of up to 10 feet of sea level rise, depending upon which article you read:

<https://grist.org/science/antarctica-doomsday-glacier-thwaites-study/>

<https://www.nature.com/articles/s41561-022-01019-9>

<https://www.bas.ac.uk/media-post/seafloor-images-explain-thwaites-glacier-retreat/>

or an estimated potential 0.5 metre sea level rise from the Pine Island ice sheet:

<https://www.bas.ac.uk/media-post/scientists-expose-vulnerabilities-of-critical-antarctic-ice-shelf/>

These projections indicate a significant increase of flood risk to the Cam-Ouse catchment and to the Fens as a whole and likely bring forward its timing.

That increase in flood risk is without taking into account the increased effects of higher high-tides and stronger tidal surges, both due to more extreme weather events. Neither does it take into account the increased run-off being caused by unwise developments in the upstream flood plain, such as around Cambridge, which can no longer be vetoed by the Environment Agency.

It is CPRE's view that this proposal is not only one of those unwise developments in a flood plain and the source of significant greenhouse gas emissions during construction, but it would also be treated as an enabler of other, equally unwise, developments around Cambridge and therefore should be halted.

### **Highways**

18. New haul roads and proposed road layout changes will need to be constructed to enable access to the proposed site during the construction phase and for ongoing operation. This will remove more land from the Cambridge Green Belt and result in general-purpose HGV, CWWTP, tanker traffic and other commercial and car traffic to service the site.

19. Increased traffic will cause additional environmental damage to the surrounding countryside and additional greenhouse gas emissions. This is a further reason for the existing CWWTP to remain in its current location.

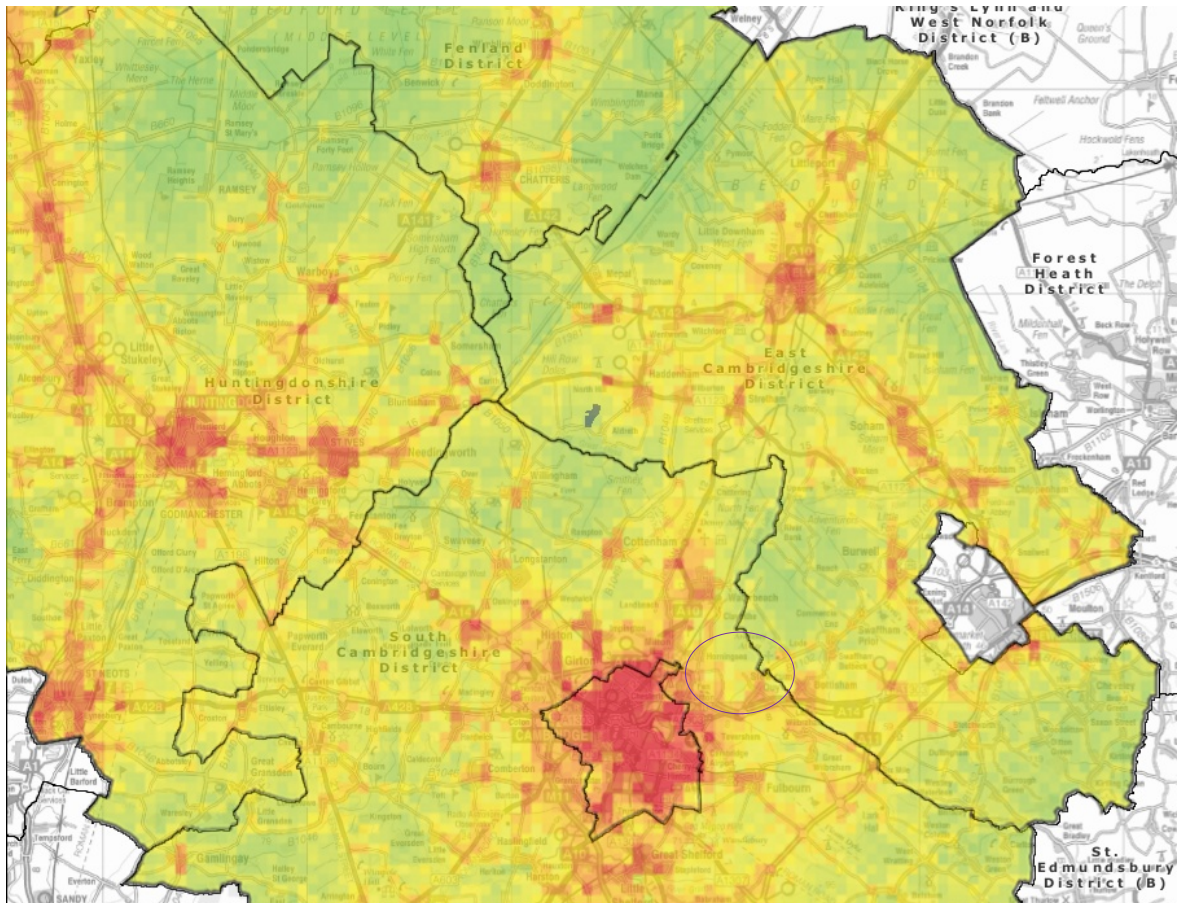
20. There is justified concern about the effect of heavily laden tankers and other traffic to/from the site on an already crowded part of the A14. It is essential that the local and national highways authorities model the effects of this proposal very carefully.

### **Tranquillity**

21. The proposed CWWTP has the potential to generate noise, dust, light pollution, odour and vibration in the Cambridge Green Belt and in the tranquil areas of the adjoining landscape.

The extract from the CPRE Tranquillity Map of Cambridgeshire displayed below, shows the site to be in a tranquil location. This may seem surprising given its relative proximity to North Cambridge and the A14. That makes it even more important that this tranquillity is protected.





- 22. Although a 400-metre buffer is proposed it is unclear what the implications for wildlife or residents will be. Wildlife does not recognise buffer-zones, it will just be in a permanently disturbed or evicted state during and after construction.
- 23. It is CPRE's view that 400 metres is an insufficient distance to fully mitigate the effects of noise, dust, light pollution, odour and vibration on nearby communities and on the surrounding countryside at all times and in all weather conditions.
- 24. CPRE considers it completely unacceptable to disturb this tranquil area with this unnecessary industrial development.

**Effects on Waterbeach**

- 25. CPRE is concerned that the impact of the proposals for the Waterbeach Zone pumping station, pipeline and haul roads on Waterbeach residents, village and countryside have not been fully assessed or consulted upon.
- 26. Waterbeach Parish Council should be properly consulted and a public consultation should be held to address the concerns of Waterbeach residents. It is important that a functional system with sufficient capacity is put in place to ensure Waterbeach and Horningsea are not at increased risk of sewer overflows and that the effects on Waterbeach of haul roads and pipe-lines on the Green Belt land they may traverse in the parish is properly and fully evaluated. It is unclear that the current evaluation of the proposal will address this issue.

**River Cam Navigation**

- 27. During one of the Public Inquiry sessions one of the Anglian Water representatives let slip that the applicant will require navigation rights on the River Cam in the area around the sewage outfall to be "permanently extinguished".

28. Following questioning by the Inspector the Anglian Water representative stated *"the applicant is seeking powers to effectively build a structure within the Cam"* and that *"once that structure is there and constructed navigation along that particular part of the Cam will not be possible and therefore the purpose of (the document) is to permanently extinguish any rights that might subsist to navigation across that section of the Cam, which will be permanently acquired following the construction the outflow"*. From this it is unclear to what width the river navigation will be obstructed either temporarily during construction or permanently.
29. The River Cam is a significant public waterway, important for recreational and commercial use. Boating traffic makes a significant contribution to the local leisure economy and the river is heavily used for several water sports, including sailing, rowing, canoeing and swimming.
30. It is an historic waterway with a significant role in maintaining the character and setting of Cambridge and the variety of its vegetation and wildlife. It is not some kind of drain for the disposal of sewage treatment product.
31. CPRE therefore objects most strongly to the arrogance of Anglian Water in presenting this issue now, when we cannot recall any mention of it being widely made during the pre-application consultation process. Although we are aware that the Cam Conservators have been approached and that Anglian Water has refused to fund their legal costs in completing any necessary legal agreement.

#### **Funding and Use of Funds**

32. In the Anglian Water document *"Site Selection Technical Study 6 Stage 3 Final Screening Assessment"*, paragraph 6.4.2 states: *"Affordability – The CWWTPR project will be funded by a grant from the HIF to facilitate the regeneration of the existing WWTP site. Without the HIF funding the relocation would not be feasible. The funding is finite, and it would not be possible to exceed it. If relocating to the Honey Hill location would cost more than is available from the grant then the project would no longer be feasible at that site area."*
33. CPRE is concerned that, because the Housing Infrastructure Fund, (HIF) funding of £227m is finite, it is probable that the choice of the Honey Hill site has been made on cost alone. Knowing how regular it is that major infrastructure projects significantly exceed budget and how much construction costs have risen since that document was written, CPRE is extremely concerned to know how the project will be funded to completion if the project cost does exceed the available HIF funding. The recent very substantial increases in the costs of construction labour and materials following BREXIT and the war in Ukraine, now make it almost certain that the costs of this project will exceed the available funding unless actions are taken, such as reducing the quality of the build or reducing the plant capacity and relying on future owners or the tax-payer to implement a second stage of construction.
34. It remains unclear if the £227m will also fund the Waterbeach pumping station or will that be the responsibility of the developers of Waterbeach New Town: Urban & Civic and Royal London Waterbeach Estates? It appears from papers available in the Waterbeach planning process, that it may be the latter. However, given the current difficulties that Waterbeach developers are having with construction costs and the cost of the intended new Waterbeach railway station, it appears unlikely that such funding will be available.
35. Anglian Water is a company with an appalling track record of infrastructure maintenance and has been fined for performance failure many times. CPRE believes that the company's priority for future investment should be in repairing its existing infrastructure. Some parts of some local villages were repeatedly without water for up to 5 days in summer 2022 and have been many times since. Their staff acknowledge when spoken to *"the pipework is rotten"*.
36. In the village of Haddenham, the electrical installation of the Haddenham Water Tower recently caught fire, apparently due to poor maintenance. This left the area without mobile-phone coverage for several days and the village Post Office closed for three weeks due to the effect on communications with the centralised Post Office retail system.

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37. Anglian Water has a poor track record of discharging untreated sewage into local rivers, including the Cam. Several of its local WWTPs, such as the one at Haslingfield, require major investment. On the other hand, the existing main Cambridge plant that this application proposes to replace, has been recently refurbished, has an operating life until 2050 and does not have a record of untreated sewage discharge.
38. The annual *"Water and sewerage companies in England: environmental performance report 2022"*, released on July 12 2023, shows Anglian Water on the lowest bar with a 2-star rating (requiring improvement) and it is stated in the associated Press Release that *"More than half of serious pollution incidents were from assets of Anglian Water and Thames Water – the Environment Agency has taken enforcement action against both companies."*  
<https://www.gov.uk/government/news/annual-report-published-on-water-company-environmental-performance>
39. According to Environment Agency records, between January 2000 and April 2023, Anglian Water was successfully prosecuted on 73 separate occasions for incidents relating to Waste Water Treatment/Discharge and fined a total of £6,548,405.00. The largest fine in April 2023 was £2,650,000.00. It is CPRE's view that Anglian Water should be putting all of its resources into correcting the known issues with its existing facilities, rather than seeking to replace one that has a good track record and a long life-span.

#### **Homes England**

40. CPRE was very concerned by the appearance of a representative of Homes England at the Public Inquiry. From the statements made it became clear that this individual's purpose was to attempt to pressure local councils and the Inspector into allowing this development because an organisation of development agents and civil servants based in London had decided, that they wanted to override local residents and bully them, the local councils and the Inspector into facilitating development of the existing CWWTP site.
41. Homes England has already achieved the destruction of the rural area of Longstanton with the unsustainable Northstowe development and, by furtively loaning public money to the private developer at Waterbeach, owned by a supposed national charity, is behind the current wrecking of the rural community of Waterbeach.
42. Planning and development of local areas is and should remain a matter for local communities and their elected local representatives. That is why they are tasked with developing and maintaining Local Plans. Homes England is an unelected quango, set on creating unsustainable developments in areas about which it has little, if any, technical knowledge or community interest. CPRE does not welcome its interference in this application.

#### **Conclusions**

1. CPRE believe that the Cambridge WWTP should remain on the existing site at Milton where there is room for a smaller, modernised facility, using new technology to be implemented when required and where the existing plant can be safely used until 2050. This is the least cost, least risk option.
2. CPRE strongly objects to the location of the proposed site in Cambridge Green Belt and the resulting loss of best and most versatile farmland, harm to the environment and harm to existing communities.
3. CPRE strongly objects to the removal of further land from the Cambridge Green Belt for new roads to support the proposed site and the intrusion of general-purpose HGV, WWT tanker traffic and other commercial and car traffic into the surrounding Green Belt countryside.
4. CPRE is very concerned by the visual impact of the proposed new plant on the Fen Edge landscape and the Wicken Fen Vision area in particular.
5. CPRE is very concerned that the tranquillity of the surrounding Fenland will be unduly harmed by light pollution, noise, odour, dust and vibration caused by the construction and operation of a new industrial plant and the offices and vehicles required to service it.



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6. CPRE is concerned by the affordability of both the relocation and the decommissioning of Milton sewage works, that the £227m HIF awarded by Homes England is finite and that the choice of site has probably been decided solely on financial considerations.
7. There is a clear risk to the completion of the project and to its resulting quality if the available funds are exceeded due to under-budgeting or, as now seems likely, due to the recent very substantial increases in the costs of construction labour and materials following BREXIT and the war in Ukraine.
8. Because the £227m is finite it is possible the viability of the proposed Cambridge North-eastern Fringe development, in which Anglian Water have a direct interest, may be compromised should further funding be required, particularly if developers are not prepared to bear any unbudgeted cost of remediation of the land, in which case the cost would fall on the tax-payer or council tax-payer.
9. CPRE consider that there should be a more detailed appraisal of the effects of the proposed replacement CWWTP on the Waterbeach Zone and request that Anglian Water consult with Waterbeach Parish Council and conduct a public consultation. Residents of Waterbeach and other members of the public are currently unable to comment properly as there are limited details of those plans which will affect Waterbeach.
10. CPRE is concerned by the apparent plans of Anglian Water to disrupt navigation on the River Cam permanently and would ask why this has not been a matter of focused public consultation.
11. It is our conclusion that this is an unnecessary move, which will cause substantial loss of Green Belt land, considerable permanent disturbance to the surrounding Green Belt and increase the risk of further development in the Green Belt. Furthermore, its construction and the destruction and remediation of the existing plant will cause considerable and avoidable greenhouse gas emissions.
12. CPRE repeats its strong objection to this proposal.
13. Please note that our submission is in respect of the proposed development. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts.

Yours faithfully,

Alan James BScTech, PhD, MIMMM, MBCS, CEnv, CITP  
On behalf of CPRE Cambridgeshire and Peterborough

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