

In support of my address to the examiners at hearings in October 2023 I would like to comment on the Strategic Carbon Assessment 7.5.2. Anglian Water freely admits there is no operational need to move the plant, so this document is all we have by way of explanation for the relocation. Cambridge City Council asserts it must put houses on the site of the existing plant because it is 'most sustainable location in Greater Cambridge'. However, the Council has failed to take into account any of the carbon cost of relocating the sewage plant when labelling the site 'highly sustainable'. The council's sustainability appraisal of potential sites for housing is not evidence based, as claimed. In fact, this Strategic Carbon Assessment has been written as an afterthought. This is quite shocking, considering the importance given to carbon savings in their designs for the new plant.

We have: -

- the 'counterfactual' scenario where you put houses somewhere else and the 'proposed' scenario where you rebuild the plant on Honey Hill.
 - three different aspects of carbon emissions considered - for the plant, for housing, for commuting
 - three different time periods: 2026-2042, 2042-61 and 2061-80
 - three different carbon practice scenarios: business as usual, mid-point scenario and zero carbon policies
 - embodied and operational carbon costs for the three aspects
 - two different speeds for housing roll out – conservative and optimistic
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- 1) the housing numbers for the counterfactual are not the same as the number of houses planned to be built on the core site. The counterfactual scenario should be for 5600 houses, not 8350.
 - 2) there is no reason for the homes of the counterfactual to be larger than those for the 'proposed'. This is not a requirement as stated on p10.
 - 3) The operational carbon for the 'proposed' scenario does not account for the air conditioners : the homes would be right next to the very busy A14 and windows would not be able to be opened because of air pollution and noise pollution.
 - 4) There is no data for a third most realistic 'somewhere in between' housing roll-out speed, in addition to the figures for conservative and optimistic figures. AW expects us to work this out for ourselves. The speed of housing roll-out is crucial to properly measuring carbon impacts in the immediate future.
 - 5) AW does not compare like for like, in terms of environmental standards for the new plant versus standards for an upgraded one in the counterfactual scenario. Please take careful note of the phrase on p18 'Giving funding limitations it is unrealistic to retrofit the WWTP to a high level, i.e. biomethane .' The implication is that AW would only upgrade to the highest environmental standards if paid for by the taxpayer. This is not a good precedent.
 - 6) All the figures throughout this assessment talk about differences in terms of percentage increase, with one exception. AW says the carbon emissions for upgrading the current plant as opposed to rebuilding it on Honey Hill are 74% less. For consistency's sake let's express this as an increase: that's an increase of 394%. Unfortunately, even that figure is wrong.
 - 7) As stated in the Mott Macdonald report 19 June 2020 the operational cost over 18 years for the tunnel alone is 21,382k. This means that the figure on p14 of 13k for operational costs of the new sewage plant til 2080 is massively underestimated and makes the 71k total completely wrong. So, in fact the carbon for the relocation (not including demolition and remediation of existing site and the carbon from the building of the new junction and all the additional traffic) is well over 600%.
 - 8) The document does not quantify the carbon impact of the demolition of the existing plant, nor the remediation of the land, despite saying that it would.
 - 9) Most importantly, as we all know, the only figures that should be compared are those produced within Period 1 (2026-2042). There can be no offsetting of carbon emissions with future savings up to 2080. Unfortunately, the climate emergency is now, and, as recognised by the Environmental Audit Committee's report on carbon in the construction May 2022, demolition and rebuild should be avoided wherever possible

Anglian Water has failed to prove that the site of the existing sewage plant is the 'most sustainable location' for housing. Anglian Water has failed to justify needing to build on Green Belt. Anglian Water has failed to prove that this is the best option for the environment, and in putting its new plant right next to Wicken Fen it will have cancelled the Wicken Fen Vision to extend the UK's most species-rich nature reserve in the UK, which is according to the National Trust, currently too small and isolated to guarantee the survival of its rare and numerous species.

Cambridge City Council made it very clear at the hearing on 18 October that it recognises the importance of the Green Belt in preserving the historic setting of Cambridge and wants to avoid building on it wherever possible, hence, the council explained, wanting to develop the Cowley Road site instead. The irony of building a sewage plant on Green Belt in order to save the Green Belt from development seems to be lost on the council.