

FRIENDS OF THE CAM'S OBJECTIONS TO MOVING THE WASTEWATER TREATMENT PLANT FROM ITS CURRENT SITE IN NORTH-EAST CAMBRIDGE TO HORNINGSEA

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INTRODUCTION

Friends of the Cam grew out of a consortium of groups who came together to campaign about the deterioration of the River Cam and the river corridor, and for their restoration and protection. We campaign against over-abstraction from the Cam aquifer which is destroying it as a natural globally treasured chalk stream, and its pollution from human sewage, agricultural and road run-off and from other chemical sources. We expose the unsustainable building of houses and infrastructure in the area which exacerbates the problems of abstraction from, and pollution of, the river.

We follow the virtually unanimous opinion of science that all planning for development has to take place in recognition of accelerating climate and biodiversity emergencies which leave us with very few years in which it may still be possible to limit environmental catastrophes during the 6th mass extinction of life on earth. This time it is a human creation - the Anthropocene. Ignoring such limits is ecocidal madness, though apparently that is the direction in which policy in the UK is currently heading.

Ours is one of the most carbon polluting parts of the country, with greenhouse gas emissions almost 25% higher per person than the UK average. It will fail to meet its legally binding carbon budget to 2050 within about three years from 2023. We remind the Inquiry that the government has been found by the [courts in 2022](#) and its own [Climate Change Committee](#) in 2023 to not have a credible path towards its own legally binding targets of carbon emissions reduction by 2050.

The growth pursued by local and central government plans will contribute significantly to the region's carbon budget. Even if the operating budget for new homes is theoretically 'zero carbon', which is unlikely, the construction budget will contribute significantly. We urge the Inquiry to take these carbon reduction targets seriously and ask Anglian Water for a clear credible audit of the carbon costs of moving the sewage works and building on the vacated site.

When people first settled in Cambridge, they did so because there was a ready supply of water in the Cam aquifers. The availability of water should be regarded as a natural regulator of population growth in an area. We have entered a period of planning foolishness in our drought prone city where there is a powerful growth lobby by a few who benefit financially including developers, estate agents, Cambridge University, and the Councils. They are in denial about the ecological limits to growth. We have an employment led housing development plan, in an area of high employment, which continually leaves a housing shortage for local people. The result of present

planning is that jobs, homes and water are being moved South into the area in a mockery of any levelling up agenda.

Housing development in Greater Cambridge is almost entirely speculative and developer led. Cambridge has become a 'gold rush' city to which developers are drawn to make quick profits on housing and office building. This includes marketing up to 25% of housing to overseas investors and failing to fulfil commitments to building affordable housing, let alone social housing or housing at social rents. And yet, the region cannot support this growth: it is the driest, hottest region of the UK which is increasingly intensified through global heating. It is amongst the areas most at risk of inundation through sea level rise and storm surges at high tides.

The City Council, who are partners in this development and stand to make a considerable financial gain, know very well that there is no water to support development. The elected councilors seem to be following the anachronistic growth imperative of their planning officers in supporting this move of the sewage works. They would be pushing for its rejection if they were truly representing the citizens of Cambridge and cared about the survival of our iconic chalk streams, including the Cam.

New circumstances of the massive additional push for growth coming from central government have arisen since this move was proposed. This is likely to highlight the impossibility of supplying water to the proposed 250,000 additional homes and will illuminate the water shortage that has been hidden in the existing growth proposals including for this scheme.

In our submission we consider who benefits and loses from the move and question *the need for 8350 houses on the North East Cambridge site*. We argue that the developments will contribute to the massive breaching our legally binding carbon emissions reduction targets. We address the limitations of water supply and the measures planned to increase it. We end with the necessity for due diligence on Anglian Water as an appropriate partner in this development for the government, the City Council and the people of Cambridge.

WHO BENEFITS, WHO LOSES FROM THE MOVE?

The argument for shifting the sewage works rests on the idea that there is a broad benefit to citizens from the employment expansion led local plan to build 8,350 homes on the vacated site. We question this assumption. We identify those who directly benefit from the sale of land and reject the idea that the development of the site is a response to housing need. We then argue that the beneficiaries are few and those losing from the massive rapid expansion of Cambridge, considerable.

Beneficiaries

The most obvious beneficiaries are those with a financial stake in the land sale for building development. Anglian Water benefits twice, from the sell-off of land and the £227 millions of public money to be granted by the government. It shares ownership of the water treatment plant site with Cambridge City Council who are promoting the move – despite their recognition that the problems of water supply have not been solved within the timescale required, and their declaration of climate and biodiversity emergencies which place a limit on permissible growth. Others who own land on the site include: LandsecU+I, the UK's biggest property company; St John's College; Trinity College; TusPark /Tsingua Univ Holdings; Brookgate; the Crown Estate and some further private landowners.

Beneficiaries also include the estate agents and all those connected to the building industry and the lobbyists for growth in the Cambridge Area such as Cambridge Ahead who gained acceptance for their employment growth led model for housing growth with the local planning authorities.

Those who lose.

The development will radically and permanently have a negative impact on the nature of Horningsea and Fen Ditton, during the building phase and afterwards. Opposition from these villages is well represented by the Save Honey Hill Group. However, the change of landscape affects the quality of life of everyone living in the area who has enjoyed the separation of city from villages in the Green Belt.

Building on the Green Belt is contrary to national planning policies. The [National Planning Policy Framework](#) demands that there should be “exceptional circumstances” before Green Belt boundaries can be changed and says that inappropriate development is harmful to the Green Belt and should be approved only in “very special circumstances”. While it advises local authorities to maximise the use of brownfield sites, moving a functioning WWTP to a greenbelt site in order to release a (contaminated) brownfield site for housing and workspaces is disingenuous at least. Moreover, the Green Belt land proposed for the relocated WWTP is of high quality historically (containing medieval villages), scenically and agriculturally. The proposed development will take agricultural production out of one of the most productive parts of the country at a time when the UK needs to be reducing food miles and increasing food security. The proposed development also borders some unique and biodiverse fenland environments, on which it will likely have deleterious impacts. There will be a heavy environmental burden (carbon, noise, particulates etc.) from the 140 truckloads of solid sewage to be imported into the Green Belt each day.

A need for more housing?

The idea that these houses are needed in the North-East of Cambridge involves a particular use of the word “need” unrelated to its common sense meaning. The relatively small number of beneficiaries or even Homes England might claim that they need the houses linked to the relatively small group of beneficiaries, including Homes England who want to fulfill government housing targets, and then it would be more accurate to call this a “want” or “desire” rather than a “need”. As we have emphasized any plan has to be set in the context of the appointment of a Central Government housing tsar for the region whose mission is to secure 250,000 new homes via Homes England.

There is, indeed, a *need* for housing for the 2121 households listed as being on the Cambridge housing waiting list on 8 February 2022. However, these households cannot afford the new speculative housing being built at any of the development sites across the city. The [average house price](#) in Cambridge March 2023 was £484,750 and £435,000 in South Cambridgeshire. House price to earnings ratios are higher in Greater Cambridge than the UK. If empty homes were brought into circulation, this would go some way to meeting housing need. There are [480 long term empty homes in Cambridge](#) + 2158 classed as second homes which includes properties furnished but left empty, and holiday lets.

While those on the housing waiting list would still struggle to afford an ‘affordable’ home, developers are managing to evade their commitment to provide a percentage of units at this price. For Station Square - [no affordable housing was built](#), despite an agreement to do so. Additionally, property development defined as student accommodation is not required to provide affordable housing options. An ‘affordable’ home is defined by the government as one that is

social rented, is privately rented offered with a 20% discount, a 'first home' on which qualifying household gets a 30% discount, or shared ownership on which qualifying households pay a 25% deposit and rent on the remainder. Given that one of the typical speculative housing developments at the edge of Cambridge city are selling 1-bedroom flats from £339,950, 2-bedroom flats from £389,950 and 2-bedroom houses from £559,950, the MINIMUM a first time buyer whose income qualifies them for the discount would have to pay for a one bedroomed flat is £226,633, or £373,300 for a 2 bedroomed house.

It is hard to establish a *need* for housing when significant numbers of new housing units are being bought by overseas buyers (20% of units in Station Square bought by overseas buyers, and the City Council had to bring in a 25% limit to the proportion of units for which it is a co-developer, that could be marketed overseas).

More housing units does not lead to cheaper housing - frequently an argument put forward by councils and developers. According to Cambridge City Council, between 2017 and 2022, there were 6,000 new housing units completed; for the same period, property prices increased by 10%.

The City admits it is struggling, stating in The Council's Medium Term Financial Strategy, Nov 20, 2023: "Growth in investment and jobs in the cluster is contributing to the rising costs of housing, traffic". While 5,544 new market-price housing units were completed in Cambridge between 2017 and 2022, only 357 council homes were completed. Given that 132 council homes were sold during this time, that is a net increase in provision of 245.

The rush for growth and housing speculation does not align with the Council's own stated priorities:

- "Leading Cambridge's response to the climate and biodiversity emergencies" and "creating a net zero Cambridge by 2030".
- "Tackling poverty and inequality and helping people in the greatest need."
- "Building a new generation of council and affordable homes and reducing homelessness."
- "Modernising the council to lead a greener city that is fair for all."

A serious push by the Council to implement its own priorities, would, as we have said, lead it to pull out of supporting the proposed move.

IS THERE ENOUGH WATER?

The river system is already being severely damaged by over-abstraction of water, and this will get worse before mitigation measures come into force. This is likely to be too late to save the Cam and other chalk streams in the area unless the amount of building is cut back. Further, the measures assume a stability of climate at a time when we know it is very unstable such that patterns of rainfall are liable to change. The shortage of water is a major crisis for the city and is well known, including by government which is nevertheless pushing for the almost tripling of the size of Cambridge. Until the water shortage is resolved there needs to be a moratorium on mass building in the area.

Water in the area is supplied by Cambridge Water owned by South Staffordshire Water in turn managed by Arjun Infrastructure Partners which manages the company on behalf of 20 institutional investors (55.1%) along with Mitsubishi Lease and Finance Company (19.9%) and Mitsubishi Corporation (25%). The present owners inherited a very generous license to extract water from the aquifer which is now being shown to be unsustainable but has not been revoked by government on the grounds of environmental damage and ecocide. Having the license in place

means that Cambridge Water are obliged to supply water up to the limits of the license even though this is not feasible. They could tell the truth but have been very reluctant to announce a ground water emergency when it happened or implement a hosepipe and have been very slow to agree to promoting water metering.

The Environment Agency has calculated that Cambridge Water need to reduce abstraction by 22 million litres per day from July 2022 levels to restore flows. This cannot be achieved through demand management, leakage reduction or license trading for two reasons: first, according to the National Audit Office, these strategies have consistently failed and second, the frenzy of growth in the Greater Cambridge Area shows no sign slowing down, and only serves to increase demand.

The Environment Agency has no confidence in Cambridge Water's ability to supply the water currently necessary, let alone for any future growth. In May 2023, the Environment Agency's response to Cambridge Water's draft water resources management plan stated that:

"We are very concerned that Cambridge Water will not be able to meet the demand for water in its area without increasing the risk of deterioration in status of water bodies ...Cambridge Water's draft water resources management plan does not provide the confidence that it can achieve its responsibilities to meet demand and protect the environment. In the short term it is reliant on demand management and drought measures to prevent its abstraction from increasing and preventing deterioration in status of water bodies. The plan does not show how the company will apply drought measures in practice to manage demand. This combined with the company's track record of not achieving forecast demand savings, means we are very concerned that it will not deliver the reductions in demand stated in the plan ...Our lack of confidence in the company's ability to deliver its future demand management reductions through 2025 to 2050, means Cambridge Water must consider how it can accelerate all its supply schemes. The company does not present any significant (greater than 5 megalitres per day) viable alternatives to demand management until 2030 when a transfer of water is potentially available from Anglian Water and then 2036/7 when the proposed Fens reservoir is due to be delivered. There is uncertainty about the deliverability of both schemes. The company does not provide confidence that it will be ready to use the transfer from Anglian Water and provide the water treatment that will be needed to put the water into supply. Cambridge Water has no alternative plan if the Fens reservoir or the transfer from Anglian Water are delayed or cannot be delivered. This presents an unacceptable risk to security of supply and the environment."

The Environment Agency has objected (October 2023) already to plans for 1000 new housing units and associated infrastructure at Darwin Green, NW Cambridge "on the grounds that it will increase abstraction and have an associated increased risk of deterioration to water bodies within the Greater Cambridge area."

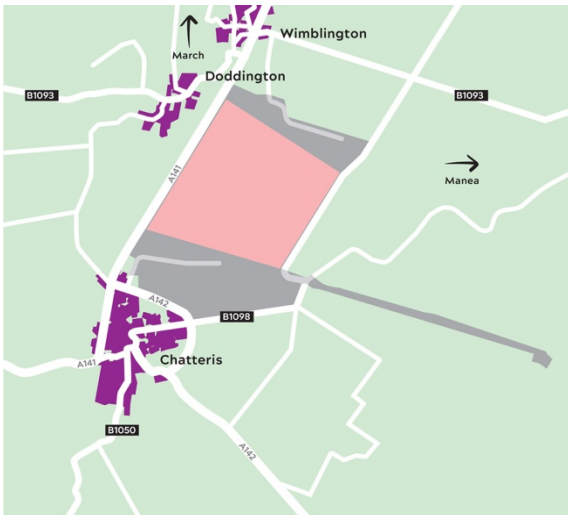
Water Resources East's Draft Regional Plan (Nov 2022) recognises that:

"The whole of Eastern England is classified as 'seriously water stressed...yet the demand for water is growing with one of the highest rates of new housing development in the country."

It argues that this situation is untenable without urgent action taken by water companies to increase the water supply. However, given the poor record of these actors, we question their ability to deliver the infrastructure required in time.

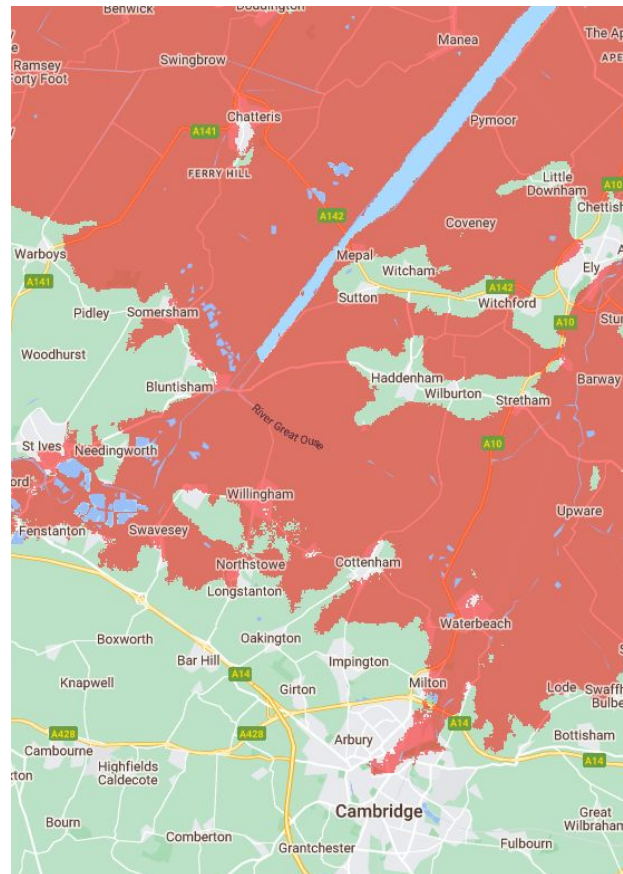
The Environment Agency summarises its response, thus:

“The Environmental Agency’s best available evidence demonstrates that the environment is under pressure from abstraction currently and in a precarious condition, and therefore the result of any additional development and the associated increases in abstraction will exceed the environmental limits until new strategic solutions, and ones that are more sustainable, can be delivered.”



Site of proposed reservoir

The Fen Reservoir is due to be built by 2036 at the earliest (site map below), although it has yet to go to a Planning Inquiry. We argue that this is not a sustainable solution to the water shortage. As the maps below show, the site identified by Anglian Water and Cambridge Water for the reservoir is just north of Chatteris, which, as [Climate Central’s Coastal Risk Screening Tool](#) shows is subject to be below the annual flood level by 2030. It is therefore highly irresponsible to rely on a reservoir which will likely not be functional.



Area in orange representing flood risk 2030.

A NEED FOR DUE DILIGENCE

We argue that conducting due diligence on Anglian Water is an important part of this enquiry. Given its highly publicised shortcomings, this would seem a necessary step in deciding if it is a fit company to be given £227 millions of public funds to assist the move. It is [£6.6 billions in debt](#). It is uncertain if it will remain in business over the period of the move let alone if it will still be operating, when its doomed new reservoir, north of low lying Chatteris, is meant to come on stream, at the earliest in 2035. The Canadian Pension Plan Investment Board is a major shareholder in Osprey Consortium which owns Anglian Water and is short betting on the failure of two other water companies in the UK, United Utilities and Severn Trent. It would seem that the Investment Board is protecting its investment in what has become a fragile business sector in the UK.

Anglian Water has a close relationship with Severn Trent which it partners for its [“Get River Positive Plan”](#).

Anglian Water, along with other water companies is notorious for pouring untreated sewage into the river systems. They did this 16,000 times in 2022, for a total of 89,000 hours and this was actually a reduction on the previous year when they had a particularly high sewage dumping rate. It is clear that Anglian Water's business plan has encouraged them to illegally dump sewage in the river even though they have been fined substantial amounts (including [£2.65 million](#) in April, 2023, but by no means an isolated incident) when caught. Anglian Water continues to pollute, while handing out bonuses to their executives and dividends to shareholders: £4.6billion 2012-2022 - [£92 million](#) in 2022 alone. This was the highest payout by any of the nine water companies; over £2 million in bonuses was paid to the two most senior staff members. This makes it abundantly clear that Anglian Water's board regard polluting the river Cam and other waterways as good for business.

At the same time Anglian Water is active in greenwashing its reputation, for example by sponsoring the Cambridge Institute for Sustainability Leadership, thus contributing to brownwashing the reputation of that organisation. The Environment Agency reported in 2022 that Anglian Water is in decline and that performance across the water companies had hit a new low. [Emma Howard Boyd](#), previous chair of the Environment Agency, excoriated those running the companies:

"For years people have seen executives and investors handsomely rewarded while the environment pays the price. Company directors let this happen. We plan to make it too painful for them to continue like this. Fines currently handed down by the courts often amount to less than a Chief Executive's salary. We need courts to impose much higher fines, prison sentences for Chief Executives and Board members whose companies are responsible for the most serious incidents and company directors struck off so they cannot move on in their careers after illegal environmental damage."

A Defra spokesperson said:

"This report shows that water companies are ignoring their legal responsibilities. Water company chiefs cannot continue to make huge profits whilst polluting our waters.

"We will not tolerate this behaviour and we will take robust action if we don't see urgent improvements. We are the first government to set out our expectation that water companies must take steps to significantly reduce storm overflows and earlier this year we consulted on a comprehensive plan to tackle the adverse impact of discharges from storm overflows."

Anglian Water set up Water Resources East (WRE) to appear as an independent water planning authority. In this venture they partner a sister extractivist company, RWE, whose business is based on the extraction of brown coal. RWE was defeated in the German courts from destroying all of the ancient Hambach Forest, a treasure house of biodiversity, but only after one protester had died trying to save its trees. Unfortunately, it has since won a court victory to expand its coal extraction activities elsewhere. RWE was unsuccessful in suing the Dutch government for outlawing the further extraction of coal in the Netherlands. [Coca Cola](#), regarded, along with Nestlé, as the world's biggest polluter of single use plastics, is another of WRE's partners. In a company claiming to be interested in the conservation of nature and laying claim to green credentials, these connections matter. They shriek of hypocrisy.

CONCLUSION

In the light of the evidence, Friends of the Cam concludes that it is reckless to permit the removal of a functioning and future-proofed wastewater treatment plant to allow the construction of more housing units on an - unremediated - brown field site. The large-scale unsustainable growth in the Cambridge area conflicts with the Government's own declaration in 2019 of a climate emergency

as well as its levelling-up agenda. It would doubly benefit Anglian Water, who repeatedly breaks the laws on illegal sewage dumping in the Cam and is of questionable financial stability, through profits from land sales and a gift of 227 pounds of public money to effect the move.

Cambridge is located within the hottest, driest, lowest lying part of the UK which has already undergone an average rise in temperature from preindustrial levels of 3 degrees centigrade and experienced an unprecedented temperature of 40 degrees in 2022. Current levels of building in the city mean that we are running out of water and the small chance of restoring our precious chalk streams to anything approaching their natural state has almost disappeared. Neither Cambridge Water nor Anglian Water have any commitment to do more than some small cosmetic interventions. The Cam is now sustained with wastewater. It should be a wake-up call, that the proposal to ameliorate the water shortage through a reservoir in the Fens involves the denial of the rapidly increasing flood risk. The shift of the sewage works into green belt land removes high grade agricultural land at a time when food security is also imperiled by environmental breakdown.

There is not a need for the sewage works to be moved or for the building of these kinds of houses in North-East Cambridge.

For all the reasons stated in this deposition, we recommend that the Inquiry refuses the planning application.

Tony Booth
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On behalf of the Friends of the River Cam

