

Cambridge City Council

Comments on Save Honey Hill's 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 2

6 December 2023



Cambridge City Councils (CCC) comments on Save Honey Hill's ('SHH') Written Representations, submitted at Deadline 1 - [REP1-171]

Page	Topic/Section/Paragraph	Comment
P.44	Section 4.7.1 Application of Odour Safeguarding/ Encroachment Policies	<p>SHH state <i>“From the Applicant’s submission, odour is understood to have reduced considerably around the existing CWRC following upgrades between 2012 and 2015 and there is evidence to suggest the 400m zone is now highly precautionary, particularly to the south and west of the existing site, yet the odour map being used by the Local Planning Authorities to inform planning advice and decisions does not reflect this.”</i></p> <p>The Councils’ responses to the ExA’s written question 2.13 includes Map 1 which shows what could be achieved in North East Cambridge if the CWWTP remains in situ. This shows the 400m buffer area in the MWLP 2021 and also specific odour contours from the Council’s evidence supporting the NECAAP, which includes updated odour modelling from 2020 and takes account of past upgrades (note the Council’s revision Local Impact Report and revision Responses to The Examining Authority’s written questions and requests for information (ExQ1) submitted at Deadline 2, which are updated to refer to the 2020 Addendum to the Odournet Study of 2018).</p> <p>The extent of areas where odour is assessed as impacting on sensitive uses such as housing is fairly comparable with the 400m buffer area to the north and south whilst excluding some outer parts of the 400m buffer area to the east and west. The suggestion that the 400m zone is <i>“highly precautionary”</i> is therefore not correct. The vast majority of the land proposed for housing in the NECAAP lies within the odour contour as well as the 400m buffer.</p>
P.46	Odour	<p>SHH state, in respect of Policy 11: Water Recycling Areas (WRAS) of the MWLP 2021 <i>“For extensions to an existing site less than 400 metres from existing buildings normally occupied by people, Policy 11(b) requires an odour assessment demonstrating that the proposal is acceptable together with appropriate mitigation measures. Policy 11(d) also states that proposals must demonstrate that ‘adequate mitigation measures will address any unacceptable</i></p>

		<p><i>adverse environmental and amenity issues raised by the proposal, which may include the enclosure of odorous processes'. In combination, these policies clearly envisage upgrading of works by enclosing odorous processes, specifically to facilitate nearby residential development within the CA"</i></p> <p>The Council's consider this to be an incorrect interpretation of Policy 11. The requirement to provide appropriate mitigation measures is only triggered where a new or an extension to an existing waste recycling centre is proposed and the application of the 400m CA area would bring <u>existing</u> sensitive receptors within the extended CA area. This is not applicable to the existing WWTP in NEC. The Policy does not require upgrading of existing works to facilitate future sensitive receptors being capable of locating within the CA area. As such SHH interpretation of Policy 11 is at odds with the Agents of Change principle now enshrined within the NPPF, and Policy 16 of the MWLP 2021 which includes a presumption against allowing sensitive receptor uses within a CA which surrounds an existing water recycling centre.</p>
P.62	Section 6.3 Lack of Compliance with relevant Local Plan Policy, Para 6.3.4	<p>SHH state "<i>There is no policy support in Policy 11 for relocation where there is no operational need.</i>"</p> <p>MWLP Policy 11 states "<i>Proposals for new water recycling capacity <u>or</u> proposals required for operational efficiency.....will be supported in principle, particularly where it is required to meet wider growth proposals identified in the Development Plan</i>" (our emphasis).</p> <p>The policy therefore supports in principle proposals that provide for new water recycling capacity as well as schemes that promote operational efficiency. This encompasses new schemes (whether or not they involve relocation) and in particular where such schemes enable wider growth which is identified in the Development Plan.</p> <p>The Councils would also refer the ExA to Cambridgeshire County Council's understanding as the relevant waste planning authority of Policy 11 as well as the background to the policy contained in Topic 1 of its LIR.</p>

P.64	<p>6.6 The Availability of Alternative Housing Sites in the GCLP to replace any Allocation at NECAAP</p> <p>Para 6.6.1</p>	<p>SHH state “<i>There is a higher Objectively Assessed Need identified in the GCLP Development Strategy Update, but for a variety of infrastructure and sustainability reasons set out in the SHH RR, this OAN is both flawed and unachievable.</i>”</p> <p>The Councils would refer the ExA to their LIRs [doc refs REP1-128 and REP1-139] at the section Development Strategy Update paragraphs 6.72 to 6.77. This sets out the Councils’ latest assessment of objectively assessed need for jobs and homes. The Councils have been clear that it may or may not be possible to deliver the increased needs in full (paragraph 6.73) but that with the proposed reservoir the Councils are confident that further sites will need to be allocated in the emerging GCLP (paragraph 6.74). On this basis North East Cambridge is confirmed for inclusion in the GCLP as the most sustainable location for strategic scale development available within Greater Cambridge (paragraph 6.75). The Councils’ evidence base to the NECAAP and the GCLP as well as the existing adopted 2018 Local Plans, which allocate and promote the NEC area already for development, provide the relevant context.</p>
P.65	<p>Para 6.6.2, Table 2 - suggested sustainable alternatives to the NECAAP housing allocation</p>	<p>SHH in their Table 2 make assumptions in relation to two sites proposed in the Councils’ GCLP First Proposals that are not an accurate representation of the position.</p> <p>To clarify, the GCLP First Proposals include the following:</p> <ul style="list-style-type: none"> - <u>Cambourne Expansion</u> – 1,950 homes are included in the First Proposals for the plan period to 2041. The Councils have been clear that a strategic scale expansion is envisaged but the total scale of development is to be confirmed following further work. A figure of 10,000 homes was used as a proxy in the Transport Evidence for testing the impact on the network of strategic scale growth but the Councils have not endorsed any scale of growth beyond the 1,950 in the First Proposals as capable of coming forward during the plan period. - <u>Cambridge Biomedical Campus (CBC)</u> – the proposed policy direction was to support development at CBC “<i>to meet local, regional or national health care needs or for biomedical and biotechnology research and development activities, related higher</i>

		<p><i>education and sui generis medical research institutes, associated support activities to meet the needs of employees and visitors, and residential uses where it would provide affordable and key worker homes for campus employees.” (See Councils’ LIR, Appendix 1, GCSP, Proposed Policy Direction S/CBC, page 85). No indicative numbers of homes were included and this will be considered further as the draft Local Plan is prepared. There is no evidence to support the figure SHH suggest of 5,000 homes at CBC which they include in their Table 2 and it should not be assumed that that kind of level of homes could be identified/accommodated or would be suitable on land at CBC, where meeting the needs of the health and life science sectors are the priority. A far more modest number of homes for staff is more likely to be identified for the CBC, within the area identified for release from the greenbelt.</i></p>
P.66-67	6.6.1 to 6.6.4 Alternatives to NECAAP	<p>SHH seek to suggest that there are sustainable alternatives to the NECAAP housing allocation <i>which “can be found without the need to identify any new strategic sites, use of greenfield or Green Belt above those already in the adopted local plans or proposed in the GCLP First Proposals”.</i> (para 6.6.1)</p> <p>SHH also state <i>“there are substantial allocations of housing sites made in the adopted Local Plans and intended in the GCLP FP which could substitute for those at NECAAP. These are principally sites identified in the housing trajectories for post 2041 development, some of which could be brought forward, within the constraints of realistic rates of housing delivery on particular sites.”</i> (para 6.6.1)</p> <p>SHH assert <i>“It is evident above that existing and proposed strategic sites, absent NECAAP, will provide a large pool of sites, in excess of 15,000 for build out post 2041, of which 9,688 are already allocated with permissions. As a whole these are more than sufficient to meet the overall GCLP housing requirement for the period to 2041 and could accommodate any additional housing anticipated at NECAAP pre and post 2041. The 3,250 homes identified for pre 2041 could be reallocated amongst existing and new sites proposed within the GCLP plan period to 2041 without the need to identify any new strategic sites, use of greenfield or green belt above those already in plan or proposed.”</i> (para 6.6.4)</p>

		<p>The Councils would draw the Examining Authority’s attention to their LIRs [refs: REP1-128 and REP1-139] where the Councils address the matter of how the emerging GCLP would have to respond if the DCO were not approved, starting at paragraph 6.78 entitled “Extent to which housing needs could be met without the relocation of the CWWTP”. Delivery rates are also addressed at “Progressing the emerging Development Plans” paragraphs 6.84-6.85.</p> <p>The Councils have looked carefully at the housing delivery rates assumed in the First Proposals, informed by many years of preparing annual housing trajectories and also the Housing Delivery Study (August 2021, see LIR Appendix 1 GCSP-28) supporting the First Proposals and Housing Delivery Study Addendum (January 2023, see LIR Appendix 1 GCSP-29) informing the Development Strategy Update.</p> <p>It is important to make realistic estimates of delivery of homes in the early years of strategic site delivery as they build up gradually, and also average annual rates that can be relied on to be delivered once they are established, which provides a reasonable estimate of how many homes can be expected to be provided on strategic sites in different locations can deliver during the plan period. The Housing Delivery Study and Addendum confirm the estimates of build-up rates and average annual rates are realistic and robust. This includes average rates of 350 dwellings per annum within or on the edge of Cambridge and 300 dwellings per annum in new settlements. To assume any higher delivery rates is not supported by the evidence and relying on higher delivery rates would put the emerging GCLP at risk of not being found sound and even if it was, at risk of not delivering assumed number of homes meaning identified needs would not be met.</p> <p>Strategic sites typically build out over several Local Plan periods and therefore it is important to make realistic assumptions about delivery rates to identify a reasonable contribution to meeting housing needs in the plan period. The Councils have made the best use of existing and proposed strategic sites in preparing the GCLP First Proposals. It is not realistic to consider these sites could deliver greater numbers of homes within the plan period to make up for the contribution to housing from the NEC that would be lost if the DCO were not approved. This applies to all the sites identified by SHH. Additional sites would need to be identified to make up the loss of 3,900 homes assumed to come forward by 2041 in the GCLP First Proposals.</p>
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