

Final Submission

This submission follows my initial submission RR-175.

I have observed the Examination process over the 6 month period and participated via membership of the Save Honey Hill Group and attended the ISH2 hearing. This submission expresses my own views and is of my own writing. The position and arguments I put forward in RR-175 still stand.

The harm to Green Belt and Historical Assets the PD would bring about are not outweighed by the environmental benefits claimed by the Applicant in the context of improved waste water infrastructure or housing.

The Applicant has acknowledged during the examination process there is no operational requirement to relocate and the environmental benefits including improved water quality, storm management capacity and carbon efficiencies can all be achieved on the existing site with the existing and or enhanced plant (REP1-078 4.1, 4.2 pg. 358-360). The public can expect these improvements to be implemented over time in keeping with the Applicant's legal obligations and corporate objectives.

It remains the case that alternatives exist to joint Councils to fulfil the objectively assessed housing need presented in the GCLP First Proposals (GCLP FP). This has been further emphasised with the changes in the NPPF (Dec 2023) which has removed the requirement of a 10% buffer now removing the requirement of 4,440 homes otherwise calculated and allocated in the GCLP FP. The allocation for build out at North East Cambridge (NEC) in the GCLP plan period has been established as 3,900, a number clearly no longer required.

During the examination process joint Councils have identified that within the current NECAAP configuration 1,425 homes lie outside WWTP the odour zone and could be delivered without a relocation. Consequently, assuming at least some build out of these with or without a revised Area Action Plan the GCLP FP has circa 2,000 surplus allocations available to contribute to the up-dated housing figures published in January 2023.

It is important to note that the total number of homes identified for build out within GCLP FP was identified as the maximum that could be realistically attained within Greater Cambridge; limiting factors include water supply, harm to the built and natural environment and market absorption rates (GCLP DS update 2023). Consequently, joint Councils are yet to configure with or without a relocation of the WWTP, whether any of the up-dated housing figures produced in January 2023 can be delivered in the plan period.

If any housing over and above the GCLP FP is to be delivered in whole or part, it is likely to occur towards the end of the plan period (GCLP DS Update 2023), at which time strategic sites currently in plan and already approved will be bringing additional housing forward contributing further to the revised housing figures.

As submitted in RR-175 there is ample legacy housing in the current local plan beyond 2041 (11,000) to accommodate the circa 4,000 homes proposed for NEC beyond 2041. If critical infrastructure requirements can be met, the new strategic sites proposed in the GCLP FP of Cambridge Airport and

Cambourne West will provide significant additional amounts of legacy housing for build out beyond 2041.

The Government's 'Vision for Cambridge', 150,000 homes, represents double the number existing in Greater Cambridge as at 2021 (Case for Cambridge 2024; GCLP FP). These figures are mind blowing; it remains to be seen what if anything will come to pass, given sustainability factors extending far beyond water and transport alone and of course, a potential change in Government anticipated by the end of this year.

The ambition of this number of homes with or without a change in Government, is independent of the GCLP which, until other notice and in-keeping with planning requirements, will proceed on the basis of calculating and allocating housing based on objectively assessed need tempered with the sustainability of delivery. Hence, the contribution housing development at NEC on a larger scale as proposed in NECAAP dependent on a relocation of the WWTP, or smaller scale is significant only in the context of the GCLP.

In conclusion it remains the case that alternatives exist to accommodate the objectively assessed housing need of Greater Cambridge in the GCLP without the requirement of a relocation of the WWTP or an additional new strategic site in the Green Belt beyond that already planned or proposed. Changes in the NPPF have reduced the number of homes required in the allocations of the GCLP FP, removing the requirement of any build out at NEC during the GCLP FP plan period and creating surplus allocations to contribute to the up-dated GCLP housing figures within the constraints of sustainable delivery.

Protection of the purposes of the Cambridge Green Belt from harm alongside historical assets remains a high priority in local and national planning policy. The PD if approved will create significant harm, while an employment led mixed development at North East Cambridge incorporating a smaller amount of housing will still make a significant economic contribution at a regional and national level without harm or encroachment on the Cambridge Green Belt and is a reasonable alternative.

I respectfully ask the ExA to recognise and rule that there is no case of 'exceptional circumstances' to justify the PD.

Refs:

[GCLP Development Strategy Up-date 2023](#)

[The Case for Cambridge 2024](#)