

CWWTPR PINS Closing Submission

Dear Mr Burley

We have paid close attention to your thorough investigation of the application by Anglian Water (AW) for a DCO to move the Cambridge sewage works to the proposed new site at Horningsea (the PD) There has been much discussion of detail and potential mitigation should the DCO be granted. However there are fundamental hurdles to be cleared before this DCO should be granted at all and we remain entirely unconvinced by AW's arguments:

1 – the PD site is Green Belt. There are only 15 of these in the country, they are special as are the towns and cities they protect. They were put in place with foresight to protect against exactly this sort of pressure. AW has not met the s29 threshold so there is no presumption of need and they must prove that 'exceptional' or 'very special' circumstances exist which justify the extraordinarily inappropriate development they propose. AW themselves have accepted that these do not exist. They rely on housing need, which under case law is not legitimate as an exceptional or very special need. Their application is contra to policies on protecting Green Belt in the NPPF and in the existing local plans. They do not appear to clear the first hurdle so surely the application should fail.

2 – AW's reliance on housing need is in any event undermined by the extent of the commercial development which is being proposed for the existing site should it be freed up. The DCO if granted would not control what becomes of the existing site and it is clear that (if only because of the severe increase in construction costs) the aim now is to maximise the financial return which has to mean much more commercial development - the current suggestion quadruples the original amount. If the same amount of housing is to be squeezed on to the existing site the density will have to increase hugely, which causes many of us very great concern. The thinking about what might become of the existing site is changing rapidly. The Examining Authority for this DCO could do nothing to control or influence this nor to ensure that the sacrifice of precious open Green Belt land at the PD would not turn out to have been a tragic waste.

3 – Standing back from all the detailed discussion, it is still not acceptable to demolish a fully operational sewage works which was upgraded in 2015 and build another one a mile up the road on a huge piece of Green Belt land, which is currently productive farmland – just to free up the existing site to develop it. No one apart from a very narrow class of entities may do this, and it is an abuse of the legal process even to propose to use the exception in this case. This is not the purpose for which this exception exists. It is frankly an outrage that a private utility which was granted the existing land to enable it to provide the local population with an essential service is making this proposal.

4 - It is not at all clear that AW could complete their proposed PD within the existing funding arrangements and there are currently indications that they would have to sell a significant amount of the existing site to developers to build commercial properties to cover their increased construction costs. It is odd that AW do potentially have this source of funds available to them, since the HIF application stated that AW were not able to contribute anything to the cost. The lack of transparency over the funding arrangements, and the byzantine structures apparently created to exploit the existing site if freed up, cause concern and undermine confidence in AW's ability to deliver if the DCO were granted.

4 – AW's purported planning benefits have not stood up to the scrutiny of the examination. They have turned out to be trivial, or smoke and mirrors. Much of what they say they would achieve in improving performance etc could be achieved where they are and arguably should be anyway. Compared with the serious and permanent very high harm which the PD would cause to the Green Belt, they are simply not benefits at all. It is very worrying that AW are magnifying these supposed benefits which don't amount to anything, and underplaying the very real damage which their PD would cause. It is frankly disingenuous which is further undermining of public confidence in them.

5 – It is clear that there is no operational reason to demolish the existing works. Despite all the detailed arguments about carbon offsetting etc it is still obviously not a sustainable action to demolish the existing works and build a new one plus new tunnels. Concrete, whatever you try to do to mitigate it, is one of the most damaging materials we use. Whatever 'writing down' of inbuilt stored energy in the existing works there may be, that works is already there, using materials and energy and there is nothing the matter with it. We live in a world where we are all painfully aware of the need to reduce our carbon footprint and to avoid unnecessary waste of resources to protect the planet. However AW dress it up, the proposed PD runs completely counter to society's current concerns and values. What is proposed is just a criminal waste in our view and that of so many people we talk to.

6 – While completely opposed to the PD, just if you were minded to recommend it there are some points we want to draw to your attention about which we have not been satisfied during the DCO process:

A – Mr Gove has issued some press releases about his vision for Cambridge, which fall short of ministerial statements and are therefore not national policy. However if he did decide to make them national policy (which they are not at present, despite what AW says) the effect would be to increase the PE by such a large factor that this application would be too small and should be withdrawn. AW would have to rethink. Probably they would need to build several more sewage works.

B – We are worried that in their plans for the PD, AW are however not making provision for more realistic growth beyond 2030. AW's existing site is large enough to build a second works and then decommission the existing one. The suggested bund design for the PD cramps what they could do on the PD and once again there is risk that the present sacrifice of irreplaceable productive Green Belt land could be a waste as it will not be suitable for the purpose in a very short space of time.

C – The design is still not worked through and AW will be left to their own devices to sort out important aspects once the DCO is closed. They have not been open about the design development process, nor have they made significant changes in response to public worries. The only material change was to remove the 'cookie-cutter' from the top. There is talk about trees and hedges but even if these all grew and were evergreen, they are not going to hide the works like they do at the present site because the geology is different and those structures are part buried. Despite possible tweaks to the suggested height of the bund and some of the bulkiest structures, the fact remains that a sewage works on raised open ground in a fen landscape on top of an aquifer cannot be buried and is going to be extremely visible for miles around. Is this acceptable? In Green Belt, we would say the answer is a resounding 'No!' This view will spoil a special fen landscape and be visible from much of north Cambridge and its new developments including the proposed housing across the road on the site of the existing works.

D - The Waterbeach pipeline is going to bring more water, including storm water, into the Cambridge catchment area. No one seems to have discussed provision for this or looked at the possible volumes.

E – There was a lot of discussion about sustainable transport etc. I still didn't hear any reason which stood up as to why 30 office workers should be moved to the PD – this sounded like either a nice to have (in which case it should be struck out as being groundless) or a camouflage for something else (in which case what is it?). Office workers can work from anywhere, as we all found out in 2020. They don't have to be based in the PD - and if they aren't, then the problem of how they get there goes away. And less of the Green Belt has to be used in accommodating them and the office space can be shrunk. Given the PD is in Green Belt, surely nothing at all should be built there unless it absolutely has to be.

F – It appears that AW's behaviour throughout has been disingenuous. This has been shown in various ways including : obtaining funding on the basis of the furthest site but the closest site was chosen; various aspects of the initial site selection process where in particular the option of staying put was not explored; making it difficult for the public to give views in the consultations, as complained about by the community in the RRs; downplaying and underestimating the permanent harm the PD would cause to multiple heritage assets and the Green Belt; AW's belittling attitude to the 'host' community – which whatever AW say is suffering harm to mental health and will be socially and economically damaged, with harm to jobs and businesses. And, unfortunately in keeping with this approach, it is not possible to digest and respond to all the wave of late and last minute documents which AW are submitting during these closing days of the DCO, many of which we have been awaiting for weeks and some of which are making significant changes. On the evidence of AW's earlier behaviour it is hard not to suspect this is a deliberate ploy. This is disrespectful to you as the Examining Authority, to the process and to the public and interested parties. Effectively AW are not consulting on these late submissions and amendments, and I trust that the material submitted will receive less weight as a result of our not having an opportunity to consider and respond.

We respectfully ask you to recommend the Secretary of State to reject AW's application for this DCO.

Jennie Pratt and Mary Fishpool, Horningsea.

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