Closing submissions on the Cambridge Waste Water Treatment Plant Relocation
from Friends of the Cam
11.04.2024

Friends of the Cam has submitted initial objections (see Appendix 1) and has attended and participated in three of the public sessions. We have been struck by how few answers Anglian Water have provided to the many questions submitted by objectors, deferring matters to Stage 6 - by which time we have no time to question the applicant. These include core matters such as accounting for the decommissioning of the plant at its end of life and mitigating damage to river quality.

From the first session, it became clear that the removal of the WWTP from Milton to Horningsea/Fen Ditton is not for any reason to do with the existing situation, but all to do with creating land for more commercial and residential development in NE Cambridge. Since the beginning of the Public Inquiry, despite the building of more and more housing, the median house price in Cambridge continues to rise: in 2023 was £492,750, while the average house price was over £500,000. However, neither these, nor the misnamed 'affordable homes', will accommodate the 2533 households now on the housing register.

From participating in the Public Inquiry, we have additional concerns, we have itemised as follows:

Biodiversity
Anglian Water (AW) appeared to assume that mitigation of degradation of river quality on the Cam could be achieved elsewhere through a 'hierarchy of Biodiversity Net Gain'. Given that the Cam and its tributaries are part of a rare and precious chalk stream system, and that AW responded that there are no mitigation credit opportunities left on the Cam or the river basin, then any mitigation is worthless.

Restriction of access to the river
It became clear at the hearing on March 13th that part of the river Cam will be taken out of public use as a concrete bunker will be created that will extrude into the river for c1 metre (though there was some obfuscation as to the actual dimensions). Its construction will require the removal of slope from the riverbank, while some sheet metal will be inserted that will, AW argued, 'prevent erosion' (a natural function of rivers). We argue that this damages the river bank and denies the right of the Cam to flow freely.

Water availability
The Environment Agency's (EA) representation to the Inquiry expressed concern about the increased flood risk and the increased volume of water consumed as a result of proposed growth. The EA has raised objections against c5000 housing units in Cambridgeshire and the Beehive redevelopment proposals for reasons of water scarcity and has now raised an objection for the construction of a new cancer research and treatment facility on the Cambridge South biomedical campus for reasons of water scarcity and a lack of evidence of a fully functioning and effective water credit market. Indeed, the EA admitted that no betterment could be expected from the removal of the WWTP, in fact there could be detriment. This is without taking into account sea level rise and tidal flooding exacerbated by fiercer storms

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The Government's own water strategy in response to supplying development is founded on an as yet undeveloped and untested, water credits system which appears to be based on retrofitting water saving devices in existing structures; and on two water transfer/storage systems. The Fens Reservoir is subject to a DCO with a public inquiry not yet underway. This is likely to be contested on several grounds, including being built on land which is potentially vulnerable to seawater inundation due to climate-induced sea level rise, and, in the process, destroying high quality agricultural land at a point in time that for many reasons the UK needs to become more self-sufficient in food. Constructing large open bodies of water in a hot region (where summer temperatures have already breached 40 degrees centigrade in recent years), will lead to high evaporation rates. Even if the reservoir eventually goes ahead, it is likely to be well beyond 2036 (the earliest estimate) before it is finished.

Carbon emissions

Assessment of carbon emissions has only focused on plant activity (though not vehicular movements to and from the plant); not on construction, decommissioning of the proposed plant or decommissioning of the Milton works. It therefore greatly underestimates carbon impact in a region which is already vastly exceeding its carbon budget, according to the Cambridgeshire and Peterborough Independent Commission on Climate. (By 2021, when the document was published, it pointed out that 'In the Cambridgeshire and Peterborough Combined Authority (CPCA) area, emissions are almost 25% higher per person than the UK average, excluding the emissions from peat.1 When we include the emissions from peatland we have only about 6 years remaining before we will have exhausted all of our 'allowed' share of emissions to 2050, if we are to play an equal part in delivering the UK's critical Net Zero target.')

Due Diligence

Since our initial objection (Appendix 1) in which we questioned the wisdom of giving a poorly performing water company public money for an unnecessary relocation of a fully functioning WWTP, it has been revealed that Anglian Water's performance has deteriorated still further. A more than fourfold increase in spills from Haslingfield Sewage Works (from 42 in 2022 to 172 in 2023, according to the Environment Agency) and a more than tenfold increase in the duration of spills would suggest that it is much more important to upgrade these sewage works than to move a better functioning WWTP. Despite worsening performance, 2023 salary figures published by the FT report AW being one of 2 water companies to increase the pay of their CEOs (by 6.6% to £1.4m pa). The AW CEO was also paid a £302,000 bonus in 2023. And while the amount of money paid in dividends was lower than in 2022, AW still lists £79m in dividends paid in the 6 months to September 2023 despite being £6.6b in debt and with a two star government grading.

Conclusion

Since we made our initial submission ahead of the Public Inquiry, Anglian Water's performance has deteriorated still further. Predictions of global heating and sea level rise suggest still hotter temperatures and risk of inundation for the low lying Cambridgeshire region, which undermines water 'solutions' stop further. In the light of this, and in the light of AW's responses to the Public Inquiry, and to the further matters that came to light

during the Inquiry (as commented on above), we can reiterate our earlier conclusions, but magnified:

“In the light of the evidence, Friends of the Cam can only conclude that to permit the removal of a functioning and future-proofed waste water treatment plant only in order to allow the construction of yet more housing units on an unremediated, brown field site is reckless. It goes against the Government’s own declaration in 2019 of a climate emergency, and its levelling-up agenda. Moreover, it grants power to do so to a law-breaking organisation (Anglian Water) with questionable financial reliability.
Even if we accept ‘growth’ as inevitable (which we don’t in a world which cries out for different measures of prosperity, and where there is no evidence that economic growth ‘trickles down’ to benefit the poor majority), who in their right mind would locate this is in a region which is (a) the hottest in the country and already recording lethal 40 degree centigrade temperatures; (b) the driest in the country, with an aquifer which is depleted beyond its capacity for renewal in anything but the long term - and with a fair (wet) wind; (c) in the lowest lying region in the UK, facing an imminent threat of inundation which will likely destroy housing and infrastructure within the next 50 years; and (d) on high quality agricultural Green Belt on which the UK’s food security depends, which will intensify as global heating threatens food imports from countries vulnerable to climate damage.
For all the reasons stated in this deposition, we recommend that this planning application be turned down."