

Submission ID: 27466

Save Honey Hill Group requests that the ExA accepts 'SHH 66 Closing Submission amended clean and tracked 170424' as submitted on 17th April 2024 to correct some typographical errors at para 11.7 and in Appendix A .  
We also ask that the ExA accepts SHH 71 Further Submission on Funding and Planning matters 170424.

**CWWTPR DCO Examination****SHH 66****Submission by Save Honey Hill Group****Closing Submission****12 April 2024****1. Introduction**

1.1 Save Honey Hill Group (SHH) is a community group formed in 2020 in response to the proposed relocation of the Cambridge Waste Water Treatment Plant (WWTP) to Honey Hill. SHH participated throughout the pre-application consultation undertaken by the Applicant and has continued to engage constructively with the Applicant and other parties throughout the DCO Examination.

1.2 This is a short Closing Submission on behalf of SHH. Extensive written submissions have been made, listed in Annex A, which are relied upon in this Closing. The ExA should refer to those submissions and, on that basis, they are not repeated here. Separate submissions have been made in SHH 67 in relation to the Revised Funding Statement, SHH 69 to the Applicant's Submissions at D6 and in SHH 68 noting Oral Submissions made at ISH5, which are only noted in this Closing Submission.

1.3 SHH and the Applicant have signed a Statement of Common Ground which has been submitted by the Applicant at D7.

**2. Summary**

2.1 Save Honey Hill's primary objective is to protect the Green Belt and in so doing the historic setting of the City of Cambridge. SHH continues to strongly object to relocation of the WWTP to Honey Hill, which has been demonstrated to be unnecessary. At the heart of this project is not the need for the infrastructure, but instead reliance is placed on the benefit of housing delivery. That is not the primary function of the national infrastructure regime. The Applicant has always stated that the relocation is predicated on the need to release brownfield land in North East Cambridge to enable housing development, and the Housing Infrastructure Fund was applied for and granted on this assumption. SHH has challenged the premise. It has objected to the application and the Applicant's arguments and shown that there is no justification. Importantly, 'very special circumstances' have not been established for the relocation.

2.2 Having considered all of the evidence, the Examining Authority (ExA) is asked to recommend to the Secretary of State that the application for the Cambridge Waste Water Treatment Plant Relocation Order be refused.

**3. Principle of Development**

3.1 The Proposed Development (PD) does not meet the thresholds set out in s29 Planning Act 2008, a point which the Applicant does not argue. It is not an NSIP by virtue of the s35 Direction. There is no 'presumption of need' and it should be determined in accordance with s105 of the Planning Act 2008, giving little weight to the NPSWW. The proposed development does not comply with key policies in the NPPF or the development plan and should not be approved. The SHH legal position is set out in SHH 04 [REP1-171], SHH 13 [REP1-170], as amplified in SHH 34 Expanded [REP4-108]. The

Applicant's submissions on the applicability of s104/105 Planning Act 2008 to the decision [AS-126] are not agreed.

#### **4. Scope of the Project**

4.1 The Applicant has not justified the inclusion of office space in the proposed Gateway Building for staff who do not need to be located at the WWTP, nor the excessive staff parking provision. The scope of the Environmental Statement (ES) should have included the demolition and remediation of the existing WWTPs at Cambridge and Waterbeach. The Environmental Statement is inadequate in other respects as set out in section 3.4 of SHH 04 [REP1-171].

#### **5. Need for Relocation and for Land Occupied by Existing Works**

5.1 The Applicant now accepts that there is no present or future operational need to relocate the works, including provision for Waterbeach and other housing development to be brought forward in the emerging GCLP and beyond. In line with the Applicant's legal obligations and corporate objectives as a waste water undertaker, the existing works can and should be improved over time achieving carbon neutrality, meeting future discharge requirements and providing increased storm water capacity. This scenario would enable an employment led mixed development on land surrounding or released from the existing works, including a substantial quantum of housing, retail and other community provision.

5.2 SHH provided extensive evidence in Section 5 of SHH 04 [REP1-171] of other large urban WWTPs, where high environmental standards are being achieved, allowing housing development in close proximity. The Applicant has not challenged or rebutted that evidence.

5.3 In SHH's view, there are no 'compelling reasons' for a DCO to be granted to meet 'the need for land occupied by the existing facilities' for housing or other development, as asserted by the Applicant. The Applicant has provided no examples where a DCO has been granted principally based on 'enabling redevelopment for housing'.

5.4 The Applicant's need case depends upon meeting housing requirements, in particular, the contribution that the land occupied by the existing works would make towards meeting the Objectively Assessed (housing) Need (OAN) in the emerging GCLP and the contribution the integrated development of the NECAAP area could make to the regional and national economy.

5.5 SHH has submitted that this case is flawed. Sustainable alternatives exist to accommodate the housing proposed for NEC without the requirement for a new strategic site in the Green Belt over and above any in plan or currently proposed. See SHH 04 Section 4 [REP1-171], REP2-059 and REP2-063. Extensive employment development in the NECAAP area is already being proposed and delivered on sites adjoining the existing works to the west and south-east.

5.6 As submitted by SHH in REP5-136, the revised NPPF has removed the requirement for a 10% buffer in the Local Planning Authorities' (LPAs') housing calculations. In the case of the GCLP First Proposals, this means a reduction of 4,440 homes from those calculated and allocated. At a stroke, this removes the requirement for the 3,900 homes allocated for build out at NEC in the GCLP plan period to 2041.

5.7 The Councils already accept that there is potential for some 1,425 houses at NECAAP without relocation of the WWTP. This means that, overall, there are around 2,000 surplus dwelling sites

allocated in the GCLP FP available which could contribute to the revised OAN for housing as set out in the Development Strategy Update.

5.8 SHH has demonstrated that the employment numbers and thus economic benefit alleged by the Applicant to be dependent on a relocation of the WWTP are identified in the adopted Local Plans as attainable without a relocation. SHH has submitted that, even without relocation of the WWTP, the employment development potential remains high at NEC and is likely to exceed the employment capacities proposed in the GCLP FP and NECAAP [REP2-066 at 7.14; SHH 50 REP5-135 at 6.27 and 6.33].

5.9 The Applicant has referred to the current Government's 'Vision for Cambridge 2040' as supporting evidence of the recognition and national importance of the PD. SHH has submitted that the most recent publication, *The Case for Cambridge* (March 2024), does not single out developments at NEC over and above any other proposed development in the GCLP FP. See SHH 61 [REP6-135]. The Government's intentions are to work with the local planning authorities to support and enable the implementation of the necessary strategic infrastructure, including water supply and integrated sustainable transport. This will enable the build out of allocations in the adopted Local Plans that are otherwise stalled and or delayed.

5.10 The emerging GCLP and NECAAP are at a relatively early stage in preparation and are yet to be subject to Examination, greatly limiting the weight that can be placed on them in determining this DCO. See SHH 67 for SHH's Response to the Revised Funding Statement, which casts even greater doubt on the reliance that can be placed on the emerging NECAAP.

5.11 The Government's intentions for Cambridge beyond this, in essence, the doubling of all the existing housing in Greater Cambridge as at 2021, will inevitably require development land areas that are far in excess of any identified in the adopted or emerging local plans. Any development at North East Cambridge, either in full as a result of relocation of the WWTP or in part without relocation, will make only a marginal contribution to meeting this aspect of the Government's Vision for Cambridge. But the place for evaluating the proper locations for housing, in terms of weighing alternatives (including those in the Green Belt) is through the local plan process, not via a single infrastructure project Development Consent Order application.

5.12 It is clear that alternatives exist to accommodate the housing requirements of the GCLP FP and the economic benefits arising from employment growth within NEC will be achieved, without the requirement for a relocation of the WWTP. Neither the Applicant nor the local planning authorities have established that housing development at NEC will be markedly more sustainable than if it takes place on other well-connected sites on the outskirts of the City. See SHH 52 [REP5-135].

5.13 Overall, SHH's position is that the 'needs case' put forward by the Applicant is weak and 'very special circumstances' do not exist to justify the significant harm identified to the purposes of the Cambridge Green Belt and any other harm, notably, multiple historical assets, that would arise from the PD.

## **6. Assessment of Alternatives**

6.1 The Applicant did not undertake a proper assessment of the potential to retain and consolidate the works on its existing site, nor has this been done by the local planning authorities as promised in the adopted local plans. The site selection process for the assessment of off-site relocation options by the Applicant was flawed in a number of respects, in particular, by the failure to properly take the constraints and harm to Green Belt into account when comparing sites; the dismissal of sites beyond

the Green Belt on cost grounds (despite the HIF grant explicitly calculated to be sufficient for such sites) and the imposition of a rigid 400m buffer from any residential property. The last of these effectively meant that the only locations to be considered were at the centre of a minimum 1.6 km diameter area of open Green Belt. This was unnecessary and unduly harmful to Green Belt, since the need for this undeveloped buffer zone could have been avoided by the adoption of industry standard odour control measures. SHH's analysis has not been rebutted effectively by the Applicant in the ES or other submissions. See SHH 04 [REP1-171 section 5].

## **7. Compliance with the NPPF and the Development Plan**

7.1 SHH's evidence is that the PD is not compliant with key policies and principles in the NPPF, in particular, para 11 (sustainable development), paras 131 to 139 (national and local design standards), paras 142 to 156 (protection of Green Belt) and para 205 (harm to significance of heritage assets). See SHH 04 [REP1-171] Section 6 and Annex A and Responses to ExA Questions in SHH 61 [REP6-135] and SHH 63 [REP6-136].

7.2 The PD does not comply with key policies in the adopted local plans and little weight should be given to the emerging proposals for NEC in the NECAAP and GCLP. See SHH 04 [REP1-171] and SHH Responses to ExA Questions.

7.3 The Applicant and the local planning authorities have conceded that neither the adopted nor emerging local plans contain policies requiring the relocation of the existing waste water treatment plant. The local planning authorities have, during Examination, been reluctant to accept the extent to which the PD does not comply with key policies in the development plan, in particular, in relation to Green Belt.

7.4 The ExA should give substantial weight to the failure of the PD to comply with policies in NPPF and the development plan.

## **8. Green Belt**

8.1 SHH considers that all of the built development proposed, including the access road and parking area, is 'inappropriate' development and that elements of the development to provide non-operational office space in the Gateway Building and excess parking cannot be justified. Very special circumstances must be demonstrated before development consent can be granted, for any development that is 'inappropriate'.

8.2 SHH disagrees fundamentally with the reasoning and analysis that the Applicant has used in its Green Belt Assessment to reach the overall conclusion of 'moderate harm' and considers that the harm should be rated as 'very high harm' which will persist permanently. SHH has provided the ExA with detailed analysis supporting this view (which draws directly on the Green Belt studies prepared for the adopted and emerging local plans). The Applicant has omitted to factor in sufficiently the impact on Cambridge Green Belt Purpose 2. The latter incorporates the qualities of the setting of Cambridge including, and of particular relevance to the application site, historical assets and the rural setting, the character and identity of its historic villages. See RR-035 Section 7; REP1-171 Section 7; REP3-068 7.1-7.7 pages 8-10.

8.3 SHH considers that the Applicant has not demonstrated that there are the 'very special circumstances' necessary to permit the development. The ExA must give great weight to the

‘substantial’ harm to the ‘openness’ and purposes of a large area of Green Belt, in reaching a recommendation. See SHH 41 [REP4-109] Section 9.

## **9. Design and Landscaping**

9.1 SHH continues to challenge the Applicant’s assertions, not supported by evidence, that the restricted circular footprint for the works within the earth bank can accommodate future demand from growth and the higher environmental standards likely to be required beyond the Phase 2 works applied for, which may be needed as early as the late 2030s. See SHH 04 [REP1-171] Section 8.2.

9.2 The submitted circular design was selected by the Applicant, without public consultation, from three concepts, as set out in the Design and Access Statement [AS-168]. The Applicant accepted at ISH3 that the other more extensive triangular or rectilinear footprints, which were rejected, would have had lower adverse impacts on the open rectilinear character of the landscape and on visual amenity. SHH is concerned that the landscape design, in particular, the narrow tree and hedge planting on top of the earth bank, crucial to screening longer views, will not be adequate. See SHH 04 [REP 1-171] Section 8 and Design Critique, SHH 41 [REP4-109] Section 8 and SHH 57 [REP5-135] in response to the LERMP.

9.3 As was obvious on the Accompanied Site Visit, the Applicant has chosen to provide taller structures above ground than at the existing works, without clear justification. The Applicant has failed to reduce the heights and hence the visual impacts of these structures as much as possible, which it could have done by adopting lower larger footprint structures and by lowering the finished floor levels of the tallest plant eg the digesters. The Applicant’s explanation as to why this would be impossible to achieve is unconvincing.

9.4 SHH notes that the LERMP has now been revised [REP5-063]. It presents improved arrangements for watering and sustaining the embankment and other planting, but these do not address the fundamental criticisms made by SHH of the earthwork planting and other aspects of the landscape design.

9.5 SHH made detailed submissions on the inadequacies of the Design Code, including the need to define accurately the minimum size parameters for the earth bank and set clear construction carbon commitments in SHH 53 [REP5-135]. SHH’s final responses to the Design Code are in SHH 69.

## **10. Carbon**

10.1 At Examination, SHH has continued to challenge the Applicant’s Strategic Carbon Assessment and ES Chapter 10 Carbon.

10.2 SHH’s review of the revised Strategic Carbon Assessment is in SHH 48 [REP5-135]. This review demonstrates that, while there may be marginal carbon savings from transport emissions by promoting housing on the existing works site, when compared to the counter-factual suburban location, these can only be tentatively estimated based on limited data. For the reasons explained in SHH 48, no carbon savings can legitimately be claimed in terms of buildings emissions at North East Cambridge as against the counter-factual.

10.3 The Applicant belatedly assessed the carbon emissions from the demolition of the existing Cambridge works, following the submission of SHH’s assessment in SHH 06 [REP1-172]. The Applicant has not included this as requested in Chapter 10 of the ES. The Applicant’s assessment of around 4,000tCO<sub>2</sub>e is, however, accepted.

10.4 SHH and the Applicant agree that extending and improving the existing works would give rise to substantially lower construction carbon emissions than the proposed relocation. SHH's estimate of 17,000tCO<sub>2</sub>e for this should be compared to the Applicant's assessment of 53,000tCO<sub>2</sub>e for the relocated works in Table 4.1 of the ES Chapter which is now at Revision 6 [REP6-019].

10.5 The Applicant has not accepted SHH's reasonable request in Section 3.7 of SHH 53 [in REP5-135] that it should set a more stringent target of 34,800tCO<sub>2</sub>e for construction of the new works. The Applicant has committed to 43,530tCO<sub>2</sub>e. Even the SHH target would still fail the Applicant's capital carbon reduction target of 70% below 2010 levels.

10.6 SHH remains of the view that the Applicant's Biomethane Export option is unlikely to be feasible or commercially viable and the ExA should assume that if the DCO is granted, the Applicant will pursue the CHP Option.

10.7 SHH's final position on carbon is summarised in Section 5 of SHH 63 Note of Oral Submissions at ISH4 and in SHH 69. The Applicant should be required to commit to net zero operational emissions, under both the CHP and biomethane options, including all activities on the site and directly related to it, without using carbon offsets or credits. The obvious way to achieve this is to require the Applicant to deploy sufficient solar generation on site for both the CHP and biomethane options to deliver net zero.

## **11. Environmental Effects and Mitigation**

11.1 The Environmental Statement fails to set out an adequate assessment of the 'main alternatives' as required by the EIA Regulations. It remains deficient in that it did not consider the demolition and remediation of the existing works site as part of the project or cumulatively.

11.2 SHH has made extensive submissions to the Examination and at hearings, challenging the content of the ES, including the assessments of significant effects and the mitigation proposed, in RR-035, SHH 04 [REP1-171] and subsequent submissions. SHH has engaged with the Applicant in seeking changes to the Management Plans, where these are needed to ensure the delivery of adequate mitigation.

11.3 SHH agrees that many of the errors and omissions in topic sections of the Environmental Statement, including the findings of the ES Transport Chapter 19 and supporting transport assessment, have now been corrected by the Applicant by numerous revisions in the course of the Examination. SHH's outstanding concerns about transport matters are set out in SHH 64, which the Applicant agreed at ISH5 to address in submissions at D7.

11.4 Outstanding technical assessments, which include the Flood Risk Assessment, water quality assessment and final effluent standards, are still with the Environment Agency for review and have yet to be accepted.

11.5 SHH has demonstrated that, in particular, the significance and severity of the residual effects in relation to certain topics, notably Green Belt, historic environment, landscape and visual impacts have all been underestimated by the Applicant in the ES.

11.6 NPPF para 206, states that 'any harm to the significance of a designated heritage asset should require clear and convincing justification.' The Tables presented by the Applicant in REP5-068 demonstrate that multiple historical assets including conservation areas and listed buildings will be harmed both during construction and post construction operation of the PD. SHH's conclusion is that

while, taken together, that the harm to heritage assets is 'less than substantial', it is at the higher end of that range. This accords with the professional evidence given on behalf of SCDC, as the relevant local planning authority. See RR-035 section 10.4; REP1-171 section 10.4.2;10.4.2.1; SHH55 REP5-135 sections 2-5.

11.7 SHH presented detailed appraisals of landscape and visual amenity effects in evidence. There will be radical changes to the open landscape character, caused both by the built development and the landscaping proposed. These are moderate adverse significant effects, which will be 'permanent', an assessment which the Applicant agrees with. SHH's evidence is that the adverse visual effects of the development, at many viewpoints, will remain significant at Year 15. These are permanent ie long term effects, which will be most obvious in winter. SHH has asked for denser planting and other measures to ensure that the embankment planting could be more effective, as well as more advance planting around the site boundaries and at certain off-site locations. Although the Applicant has clarified the arrangements for watering and managing the embankment planting, no changes to the landscape design have been made by the Applicant. See RR-035 sections 10.5, 13.3; REP1-171 section 10.5; SHH56 REP5-135; SHH61 REP6-135.

11.8 SHH welcomes the Applicant's late concession to make the new bridleway along the old railway permanent, but considers that in order to sufficiently mitigate the harm of the proposed development, the Applicant should commit to maintaining the landscaped areas and allowing recreational use of the land it will control around the works not for 30 years but for the 'lifetime of the works'. It should also allow public use of parking on site. The Applicant has stated that it intends to amend the draft s106 agreement to take account of concerns by SHH, QFT and other parties about mitigating recreational pressures on the wider countryside including Quy Fen SSSI, but SHH has not yet seen the final draft agreement.

## **12. Funding and Deliverability**

12.1 SHH's long standing concerns about the certainty of funding and hence the deliverability of the relocation have been set out in submissions. See Section 11 of RR-035, Section 11 of SHH 04 [REP1-171] and SHH 22 [REP3-068], in particular. Although the Applicant has provided many of the HIF Business Case and other documents in redacted form to the Examination, many of SHH's forensic questions have never been answered. The problem arises, principally, because the HIF Grant, a fixed cash sum at 2018 prices, is tightly restricted and unlikely to be sufficient, and the Applicant cannot call on revenues from its regulated business to meet any shortfall. The Applicant's Funding Statement [REP4-109], did not deliver the necessary assurances required by the Compulsory Acquisition Guidelines.

12.2 The Applicant has provided a radically revised Funding Statement at D6 [REP6-003], increasing the overall funding budget by some 63%. The implications of this in particular is that it substantially undermines the Applicant's reliance on the 'planning case' for enabling housing development in accordance with the NECAAP 'vision'. SHH's response is set out in SHH 67.

12.3 SHH's position, based on a proper reading of the Compulsory Acquisition Guidelines, is that the DCO, in particular, the Compulsory Acquisition powers, should not be granted unless the Applicant can confirm, before the close of the Examination, that full funding for the project, including that required to cover cost inflation, over and above the HIF Grant, is likely to be available. It is not



sufficient to make this a Requirement to be fulfilled after grant of the DCO, but before the CA powers are exercised.

### **13. Draft DCO**

13.1 The Applicant has yet to submit a final draft DCO. SHH made requests for drafting changes to the dDCO, principally in Article 6, Schedule 2, Schedule 14, the relevant plans and to the Design Code in SHH 40 and elsewhere. Some of these have been met. Requests for changes to the CTMP and OLTP were made in SHH 64 and at ISH5.

13.2 SHH's outstanding requests, where these are important, are set out in SHH 69.

### **14. Overall Planning Balance**

14.1 This application falls to be determined under s105 of the Planning Act 2008. The application does not meet crucial policies in the NPPF or the adopted local plans and great weight should be given to this by the ExA in making a recommendation.

14.2 There is no operational need for the relocation, as accepted by the Applicant and no policies requiring relocation in the adopted local plans. The emerging local plans do not require relocation, are at an early stage in preparation and will require substantive review and amendment before they can proceed to scrutiny at Examination. The proposals for North East Cambridge in NECAAP are flawed and will be challenged. The housing requirements in the GCLP First Proposals can sensibly be met on other identified sites in Greater Cambridge. Little weight should be given to the emerging GCLP and NECAAP.

14.3 The Applicant can cite no other DCO, where enabling the redevelopment of the existing site of that infrastructure was the principal justification for the DCO.

14.4 The Applicant needs to establish 'very special circumstances' exist to overcome the harm to Green Belt, as set out in the NPPF paras 152 and 153 and the NPSWW para 4.8.14. The latter makes clear that "*very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the decision maker will attach substantial weight to the harm to the Green Belt when considering any application for such development*". The development is inappropriate development and will cause substantial or 'very high' harm to the Green Belt.

14.5 Although the PD results in 'less than substantial harm' to heritage assets, this harm must be given 'great weight' as noted in para 205 of the NPPF.

14.6 Other harm has been identified by the Applicant and summarised in para 6.1.7 of the Planning Statement [REP1-049]. SHH's evidence is that the Applicant's assessment of harm to heritage assets, impact on landscape and visual amenity have been underestimated and impact of significant adverse effect on HCLA22 under-reported in the summary of 'other harms' in the Planning Statement. SHH agrees that all the other harms are correctly listed by the Applicant in para 6.1.7.

14.7 SHH disagrees with the Applicant's claim that there are ten direct 'planning benefits' of relocation, in para 2.2.17 and para 6.2.13 of REP1-049. The claimed benefits are overstated and should be given little weight in the planning balance. The table below has been updated from that included as Table 7 in SHH 04 [REP1-171] to take account of subsequent submissions to the Examination by the Applicant, SHH and other parties. Taken together, these do not constitute sufficient benefits to create 'very special circumstances'.

<b>Benefit claimed</b>	<b>Accuracy of Applicant's claim</b>	<b>Achievable on existing site by consolidating and/or enhancing existing works</b>	<b>Normal requirement for grant of consent for new waste water facility</b>	<b>Specific DCO 'mitigation'</b>	<b>Weight to be accorded to claimed benefit in SHH's view</b>
Modern low carbon waste water treatment facility	No evidence that 'state of the art' technology is to be used. PD does not achieve 70% capital carbon reduction target. Existing works could be upgraded with much lower carbon emissions	Yes	Yes		The unnecessary capital carbon emissions from relocation are a dis-benefit
Improving storm resilience	Marginal improvement through use of transfer tunnel. Transfer tunnel only provides 5,000 cu metres of storage.	Yes, additional storm water tanks could be provided on existing site	Yes		Limited
Improving quality of recycled water returned to River Cam	Marginal improvement over existing, but not verified by Environment Agency. Discharge standards being set are not stringent enough	Yes	Yes		Limited
Restore and enhance surrounding environment (biodiversity)	Biodiversity target low given proposed site is arable farmed land. Ignores biodiversity loss from redevelopment of existing site		Yes, if dealt with as planning application	Yes, offered by Applicant	None
Maximise public value and support circular economy	Works produces products eg sludge and greenhouse gases, which have to be recycled, as is done at existing works.	Yes	Yes		None
Operational and capital cost efficiencies and carbon cost reduction	No evidence of operational or capital cost efficiencies of combined provision. The only feasible option, CHP, does not achieve genuine operational net zero target on site, including activities based at site, excluding offsets.	Yes. Piping Waterbeach effluent to existing works and further carbon emissions reductions at existing works can achieve this.	Yes		No evidence to support capital cost efficiencies of combined provision.  None
Improve access to countryside	Minor improvement to public bridleway network.			Yes, offered by Applicant	Limited
Enhance education	Small unproven benefit.	Yes		Not required as part of the DCO	Limited
Enhance recreational opportunities	Public use of land around works constrained by absence of parking and failure to commit to long term public access.			Yes, offered by Applicant	Limited

Benefit claimed	Accuracy of Applicant's claim	Achievable on existing site by consolidating and/or enhancing existing works	Normal requirement for grant of consent for new waste water facility	Specific DCO 'mitigation'	Weight to be accorded to claimed benefit in SHH's view
Socio-economic benefits during construction	These have never been articulated or quantified by the Applicant	To an extent			Limited

## 15. Conclusion

15.1 Having considered all of the evidence, the ExA is asked to recommend to the Secretary of State that the application for the Cambridge Waste Water Treatment Plant Relocation Order be refused.

### Appendix A List of Submissions Made by SHH to the DCO Examination

SHH Doc. No.	ExLib No.	SHH Title	PINS Title
SHH 01	RR-035	Save Honey Hill Relevant Representations	Save Honey Hill Group
SHH 02	PDA-003	Procedural request – Timetable change	PM SHH Request for Change of Timetable Save Honey Hill Group
SHH 03	REP1-175 Rep1-176	Video, pro-forma. Video transcripts	Written Representations (video) Written Representations (video transcript)
SHH 04	REP1-171	Save Honey Hill Written Representations	Written Representations
SHH 05	REP1-172	Save Honey Hill Written Representations Appendix A: Health Survey Methodology & Results	Written Representations (appendices)
SHH 06	REP1-172	Save Honey Hill Written Representations Appendix B: CUED Greenhouse Gas Emissions Accounting for Demolition CWWTP	Written Representations (appendices)
SHH 07	REP1-167 REP1-168	Request for Additional Locations to include in Accompanied Site Inspection (ASI) & wish to attend	Notification of wish to attend ASI Comments on ASI locations
SHH 08	REP1-172	Save Honey Hill Written Representations Appendix C: Design Critique	Written Representations (appendices)

SHH 09	REP1-173 REP1-174	SHH Appendix E Additional reference documents: Darwin Green JDCC 18/10/23 Brookgate	Written Representations (supporting information)
SHH 10	REP1-172	Save Honey Hill Written Representations Appendix D: Maps	Written Representations (appendices)
SHH 11		SHH Request to Applicant for Amendments and Clarifications to dDCO and Plans as introduced at ISH1.	
SHH 12	REP1-169	ISH1 dDCO SHH Summary of Oral Submissions FINAL 061123	Summary of Oral Submissions at ISH1
SHH 13	REP1-170	SHH Summary of Oral Submissions re Principle of Development at ISH2	Summary of Oral Submissions at ISH2
SHH 14	REP1-172	Save Honey Hill Written Representation Appendix F Summary	Written Representations (appendices)
SHH 15		SHH Response to SoCG Rev 01	
SHH 16		Not used	
SHH 17	REP2-058	SHH Covering letter	Comments on responses to ExA's ExQ1
SHH 18	REP2-059	SHH Comments on SCDC Responses to ExQ1	Comments on responses to ExA's ExQ1- 2
SHH 19	REP2-065	Comments on Cambs. County Council LIR	Comments on Local Impact Report - 1
SHH 20	REP2-066	Comments on SCDC LIR	Comments on Local Impact Report -2
SHH 21	REP2-064	Comments on City Council LIR	Comments on Local Impact Report
SHH 22	REP2-067	HIF Grant Conditions Submissions	Comments on any submissions received at D1-part 1
SHH 23	REP2-068	Comments on Errors and Omissions in Planning Statement	Comments on any submissions received at D1-part 2
SHH 24		SHH 11 Updated to Reflect dDCO at Rev 05	
SHH 25		Request for Changes to Schedule 2 Requirements	
SHH 26	REP2-060	SHH Comments on EA responses to ExQ1	Comments on responses to ExA's ExQ1- 3

SHH 27	REP2-069	Comments on Natural England WR	Comments on Natural England's Written Representations
SHH 28	REP2-063	SHH Comments on Applicant's responses to ExQ1	Comments on responses to ExA's ExQ1- 1
SHH 29	REP2-061	SHH comments on City Council Responses to ExQ1	Comments on responses to ExA's ExQ1- 4
SHH 30	REP2-062	SHH comments on County Council Responses to ExQ1	Comments on responses to ExA's ExQ1- 5
SHH 31	REP2-070	SHH comments on EA-AW SoCG	Comments on Anglian Water – Environment Agency progressed SoCG
SHH 32	REP3-067	Response to SCDC and Cambridge City Council Amendments to LIRs	Comments to comments on SCDC and Cambridge City Council amended Local Impact Report (LIR)
SHH 33	REP3-068	Response to SCDC and City Council Comments on SHH WR	Comments on any submissions received at D1 – part 2
SHH 34 SHH 34 Expd.	REP3-068 REP4-108	Comments on 8.13 Applicant's Responses on WRs Expanded as tracked and clean	Comments on any submissions received at D1 – part 2 Comments on any submissions received at D3 D4-3
SHH 35	REP4-106	SHH Response to the Applicant's Responses to Written Representations Document 8.13 [REP2-038]	Comments on any submissions received at D3 D4-1
SHH 36		Letter to Lead ExA re deferral	
SHH 37	REP3-065	Submissions for D3 and Further Submissions Cover Letter	Comments on any submissions received at D2
SHH 38	REP3-066	Comments on Applicant's Responses to LIRs	Response to Applicant's comments on Local Impact Report (LIR)
SHH 39	REP4-106	Inconsistencies & Errors in ES Ch 2 to AW (MD) 12/01/24	Comments on any submissions received at D3 D4-1
SHH 40	REP4-106	SHH Outstanding Concerns about Drafting of dDCO and Relevant Plans	Comments on any submissions received at D3 D4-2
SHH 41	REP4-109	ISH3 – Environmental Matters Day 2, 11 January 2024; Summary of Oral Submissions	Written Summaries of oral submissions made at any hearing D4-4
SHH 42	REP4-106	SHH Response to the Applicant's comments on Save Honey Hill's Deadline 2 submissions 8.14 – Sections 2.9 and 2.5 - Funding [REP3-054]	Comments on any submissions received at D3 D41
SHH 43	REP4-106	Note regarding Quy Fen and Black Ditch: Water Pollution Control and Monitoring	Comments on any submissions received at D3 D4-1

SHH 45	REP4-109	CAH1 – Compulsory Acquisition Hearing 1, 9 January 2024: Summary of Oral Submissions	Written Summaries of oral submissions made at any hearing D4-4
SHH 46	REP4-109	ISH3 – Environmental Matters Day 1: Summary of Oral submissions	Written Summaries of oral submissions made at any hearing D4-4
SHH 47	REP4-105	D4 Submissions by SHH at D4	Description and list of submitted documents
SHH 48	REP5-135	REP3-042 Strategic Carbon Assessment Revised and Response from Applicant	Comments on any submissions received at D4
SHH 49		SoCG Rev 02 SHH proposed amendments	
SHH 50	REP5-135	SHH Response to the SCDC REP3-060 Comments on LIR Responses	Comments on any submissions received at D4
SHH 51	REP5-136	Responses to ExQ2	Responses to ExQ2
SHH 52	REP5-135	Response to Strategic Carbon Assessment and Carbon Conclusions REP3-042 REP2-037	Comments on any submissions received at D4
SHH 53	REP5-135	Response to draft Design Code REP4-085	Comments on any submissions received at D4
SHH 54	REP5-135	Comments on Hedgerow and Tree Preservation Plans REP4-021	Comments on any submissions received at D4
SHH 55	REP5-135	Response to ES Chapter 13 Historic Environment REP4-030 and Tables REP4-067	Comments on any submissions received at D4
SHH 56	REP5-135	Comments on ES Chapter 15 LVA REP4-033.	Comments on any submissions received at D4
SHH 57	REP5-135	Response to LERMP Rev 03 REP4-057	Comments on any submissions received at D4
SHH 58	REP5-135	Comments on REP4-069 5.4.19.7 Rev 05 Construction Traffic Management Plan and App. F to REP4-087	Comments on any submissions received at D4
SHH 59	REP5-135	Comments on Lighting Design Strategy REP4-048	Comments on any submissions received at D4
SHH 60	REP5-135	List of SHH submissions updated at D5	Comments on any submissions received at D4
SHH 61	REP6-135	SHH Comments on Responses to Examining Authority's Second Written Questions (ExQ2) by the Applicant, Cambridgeshire County Council and South Cambridgeshire District Council (REP5-111, REP5-118, REP5-122)	Comments on any submissions received at D5 2
SHH 62	REP6-137	ISH4 – Draft DCO and Environmental Matters, 13 and 14 March 2024: Summary of SHH Oral Submissions	Written summaries of oral submissions made at any hearing (ISH4)

SHH 63	REP6-136	SHH Responses to Examining Authority's Third Written Questions (ExQ3)	Responses to ExQ3
SHH 64	REP-134	Response to Applicant's revised Traffic and Transport submission	Comments on any submissions received at D5 1
SHH 65	REP6-133	SHH submissions made at D6	Cover letter
SHH 66		SHH Closing Submission	
SHH 67		Funding and Related Planning Matters Incl. Annex A Selected Figures from NECAAP Reg. 19 Submission Draft	
SHH 68		Written Note of Oral Submissions at ISH5	
SHH 69		Response to Submissions by the Applicant made at D6	
SHH 70		Signed Statement of Common Ground with Applicant	

SHH Closing Submission

SHH 66

**CWWTPR DCO Examination**

SHH 66

**Submission by Save Honey Hill Group**

**Closing Submission**

**12 April 2024**

**1. Introduction**

1.1 Save Honey Hill Group (SHH) is a community group formed in 2020 in response to the proposed relocation of the Cambridge Waste Water Treatment Plant (WWTP) to Honey Hill. SHH participated throughout the pre-application consultation undertaken by the Applicant and has continued to engage constructively with the Applicant and other parties throughout the DCO Examination.

1.2 This is a short Closing Submission on behalf of SHH. Extensive written submissions have been made, listed in Annex A, which are relied upon in this Closing. The ExA should refer to those submissions and, on that basis, they are not repeated here. Separate submissions have been made in SHH 67 in relation to the Revised Funding Statement, SHH 69 to the Applicant's Submissions at D6 and in SHH 68 noting Oral Submissions made at ISH5, which are only noted in this Closing Submission.

1.3 SHH and the Applicant have signed a Statement of Common Ground which has been submitted by the Applicant at D7.

**2. Summary**

2.1 Save Honey Hill's primary objective is to protect the Green Belt and in so doing the historic setting of the City of Cambridge. SHH continues to strongly object to relocation of the WWTP to Honey Hill, which has been demonstrated to be unnecessary. At the heart of this project is not the need for the infrastructure, but instead reliance is placed on the benefit of housing delivery. That is not the primary function of the national infrastructure regime. The Applicant has always stated that the relocation is predicated on the need to release brownfield land in North East Cambridge to enable housing development, and the Housing Infrastructure Fund was applied for and granted on this assumption. SHH has challenged the premise. It has objected to the application and the Applicant's arguments and shown that there is no justification. Importantly, 'very special circumstances' have not been established for the relocation.

2.2 Having considered all of the evidence, the Examining Authority (ExA) is asked to recommend to the Secretary of State that the application for the Cambridge Waste Water Treatment Plant Relocation Order be refused.

**3. Principle of Development**

3.1 The Proposed Development (PD) does not meet the thresholds set out in s29 Planning Act 2008, a point which the Applicant does not argue. It is not an NSIP by virtue of the s35 Direction. There is no 'presumption of need' and it should be determined in accordance with s105 of the Planning Act 2008, giving little weight to the NPSWW. The proposed development does not comply with key policies in the NPPF or the development plan and should not be approved. The SHH legal position is set out in SHH 04 [REP1-171], SHH 13 [REP1-170], as amplified in SHH 34 Expanded [REP4-108]. The



Applicant's submissions on the applicability of s104/105 Planning Act 2008 to the decision [AS-126] are not agreed.

#### **4. Scope of the Project**

4.1 The Applicant has not justified the inclusion of office space in the proposed Gateway Building for staff who do not need to be located at the WWTP, nor the excessive staff parking provision. The scope of the Environmental Statement (ES) should have included the demolition and remediation of the existing WWTPs at Cambridge and Waterbeach. The Environmental Statement is inadequate in other respects as set out in section 3.4 of SHH 04 [REP1-171].

#### **5. Need for Relocation and for Land Occupied by Existing Works**

5.1 The Applicant now accepts that there is no present or future operational need to relocate the works, including provision for Waterbeach and other housing development to be brought forward in the emerging GCLP and beyond. In line with the Applicant's legal obligations and corporate objectives as a waste water undertaker, the existing works can and should be improved over time achieving carbon neutrality, meeting future discharge requirements and providing increased storm water capacity. This scenario would enable an employment led mixed development on land surrounding or released from the existing works, including a substantial quantum of housing, retail and other community provision.

5.2 SHH provided extensive evidence in Section 5 of SHH 04 [REP1-171] of other large urban WWTPs, where high environmental standards are being achieved, allowing housing development in close proximity. The Applicant has not challenged or rebutted that evidence.

5.3 In SHH's view, there are no 'compelling reasons' for a DCO to be granted to meet 'the need for land occupied by the existing facilities' for housing or other development, as asserted by the Applicant. The Applicant has provided no examples where a DCO has been granted principally based on 'enabling redevelopment for housing'.

5.4 The Applicant's need case depends upon meeting housing requirements, in particular, the contribution that the land occupied by the existing works would make towards meeting the Objectively Assessed (housing) Need (OAN) in the emerging GCLP and the contribution the integrated development of the NECAAP area could make to the regional and national economy.

5.5 SHH has submitted that this case is flawed. Sustainable alternatives exist to accommodate the housing proposed for NEC without the requirement for a new strategic site in the Green Belt over and above any in plan or currently proposed. See SHH 04 Section 4 [REP1-171], REP2-059 and REP2-063. Extensive employment development in the NECAAP area is already being proposed and delivered on sites adjoining the existing works to the west and south-east.

5.6 As submitted by SHH in REP5-136, the revised NPPF has removed the requirement for a 10% buffer in the Local Planning Authorities' (LPAs') housing calculations. In the case of the GCLP First Proposals, this means a reduction of 4,440 homes from those calculated and allocated. At a stroke, this removes the requirement for the 3,900 homes allocated for build out at NEC in the GCLP plan period to 2041.

5.7 The Councils already accept that there is potential for some 1,425 houses at NECAAP without relocation of the WWTP. This means that, overall, there are around 2,000 surplus dwelling sites

allocated in the GCLP FP available which could contribute to the revised OAN for housing as set out in the Development Strategy Update.

5.8 SHH has demonstrated that the employment numbers and thus economic benefit alleged by the Applicant to be dependent on a relocation of the WWTP are identified in the adopted Local Plans as attainable without a relocation. SHH has submitted that, even without relocation of the WWTP, the employment development potential remains high at NEC and is likely to exceed the employment capacities proposed in the GCLP FP and NECAAP [REP2-066 at 7.14; SHH 50 REP5-135 at 6.27 and 6.33].

5.9 The Applicant has referred to the current Government's 'Vision for Cambridge 2040' as supporting evidence of the recognition and national importance of the PD. SHH has submitted that the most recent publication, The Case for Cambridge (March 2024), does not single out developments at NEC over and above any other proposed development in the GCLP FP. See SHH 61 [REP6-135]. The Government's intentions are to work with the local planning authorities to support and enable the implementation of the necessary strategic infrastructure, including water supply and integrated sustainable transport. This will enable the build out of allocations in the adopted Local Plans that are otherwise stalled and or delayed.

5.10 The emerging GCLP and NECAAP are at a relatively early stage in preparation and are yet to be subject to Examination, greatly limiting the weight that can be placed on them in determining this DCO. See SHH 67 for SHH's Response to the Revised Funding Statement, which casts even greater doubt on the reliance that can be placed on the emerging NECAAP.

5.11 The Government's intentions for Cambridge beyond this, in essence, the doubling of all the existing housing in Greater Cambridge as at 2021, will inevitably require development land areas that are far in excess of any identified in the adopted or emerging local plans. Any development at North East Cambridge, either in full as a result of relocation of the WWTP or in part without relocation, will make only a marginal contribution to meeting this aspect of the Government's Vision for Cambridge. But the place for evaluating the proper locations for housing, in terms of weighing alternatives (including those in the Green Belt) is through the local plan process, not via a single infrastructure project Development Consent Order application.

5.12 It is clear that alternatives exist to accommodate the housing requirements of the GCLP FP and the economic benefits arising from employment growth within NEC will be achieved, without the requirement for a relocation of the WWTP. Neither the Applicant nor the local planning authorities have established that housing development at NEC will be markedly more sustainable than if it takes place on other well-connected sites on the outskirts of the City. See SHH 52 [REP5-135].

5.13 Overall, SHH's position is that the 'needs case' put forward by the Applicant is weak and 'very special circumstances' do not exist to justify the significant harm identified to the purposes of the Cambridge Green Belt and any other harm, notably, multiple historical assets, that would arise from the PD.

## **6. Assessment of Alternatives**

6.1 The Applicant did not undertake a proper assessment of the potential to retain and consolidate the works on its existing site, nor has this been done by the local planning authorities as promised in the adopted local plans. The site selection process for the assessment of off-site relocation options by the Applicant was flawed in a number of respects, in particular, by the failure to properly take the constraints and harm to Green Belt into account when comparing sites; the dismissal of sites beyond

the Green Belt on cost grounds (despite the HIF grant explicitly calculated to be sufficient for such sites) and the imposition of a rigid 400m buffer from any residential property. The last of these effectively meant that the only locations to be considered were at the centre of a minimum 1.6 km diameter area of open Green Belt. This was unnecessary and unduly harmful to Green Belt, since the need for this undeveloped buffer zone could have been avoided by the adoption of industry standard odour control measures. SHH's analysis has not been rebutted effectively by the Applicant in the ES or other submissions. See SHH 04 [REP1-171 section 5].

## **7. Compliance with the NPPF and the Development Plan**

7.1 SHH's evidence is that the PD is not compliant with key policies and principles in the NPPF, in particular, para 11 (sustainable development), paras 131 to 139 (national and local design standards), paras 142 to 156 (protection of Green Belt) and para 205 (harm to significance of heritage assets). See SHH 04 [REP1-171] Section 6 and Annex A and Responses to ExA Questions in SHH 61 [REP6-135] and SHH 63 [REP6-136].

7.2 The PD does not comply with key policies in the adopted local plans and little weight should be given to the emerging proposals for NEC in the NECAAP and GCLP. See SHH 04 [REP1-171] and SHH Responses to ExA Questions.

7.3 The Applicant and the local planning authorities have conceded that neither the adopted nor emerging local plans contain policies requiring the relocation of the existing waste water treatment plant. The local planning authorities have, during Examination, been reluctant to accept the extent to which the PD does not comply with key policies in the development plan, in particular, in relation to Green Belt.

7.4 The ExA should give substantial weight to the failure of the PD to comply with policies in NPPF and the development plan.

## **8. Green Belt**

8.1 SHH considers that all of the built development proposed, including the access road and parking area, is 'inappropriate' development and that elements of the development to provide non-operational office space in the Gateway Building and excess parking cannot be justified. Very special circumstances must be demonstrated before development consent can be granted, for any development that is 'inappropriate'.

8.2 SHH disagrees fundamentally with the reasoning and analysis that the Applicant has used in its Green Belt Assessment to reach the overall conclusion of 'moderate harm' and considers that the harm should be rated as 'very high harm' which will persist permanently. SHH has provided the ExA with detailed analysis supporting this view (which draws directly on the Green Belt studies prepared for the adopted and emerging local plans). The Applicant has omitted to factor in sufficiently the impact on Cambridge Green Belt Purpose 2. The latter incorporates the qualities of the setting of Cambridge including, and of particular relevance to the application site, historical assets and the rural setting, the character and identity of its historic villages. See RR-035 Section 7; REP1-171 Section 7; REP3-068 7.1-7.7 pages 8-10.

8.3 SHH considers that the Applicant has not demonstrated that there are the 'very special circumstances' necessary to permit the development. The ExA must give great weight to the

'substantial' harm to the 'openness' and purposes of a large area of Green Belt, in reaching a recommendation. See SHH 41 [REP4-109] Section 9.

## **9. Design and Landscaping**

9.1 SHH continues to challenge the Applicant's assertions, not supported by evidence, that the restricted circular footprint for the works within the earth bank can accommodate future demand from growth and the higher environmental standards likely to be required beyond the Phase 2 works applied for, which may be needed as early as the late 2030s. See SHH 04 [REP1-171] Section 8.2.

9.2 The submitted circular design was selected by the Applicant, without public consultation, from three concepts, as set out in the Design and Access Statement [AS-168]. The Applicant accepted at ISH3 that the other more extensive triangular or rectilinear footprints, which were rejected, would have had lower adverse impacts on the open rectilinear character of the landscape and on visual amenity. SHH is concerned that the landscape design, in particular, the narrow tree and hedge planting on top of the earth bank, crucial to screening longer views, will not be adequate. See SHH 04 [REP 1-171] Section 8 and Design Critique, SHH 41 [REP4-109] Section 8 and SHH 57 [REP5-135] in response to the LERMP.

9.3 As was obvious on the Accompanied Site Visit, the Applicant has chosen to provide taller structures above ground than at the existing works, without clear justification. The Applicant has failed to reduce the heights and hence the visual impacts of these structures as much as possible, which it could have done by adopting lower larger footprint structures and by lowering the finished floor levels of the tallest plant eg the digesters. The Applicant's explanation as to why this would be impossible to achieve is unconvincing.

9.4 SHH notes that the LERMP has now been revised [REP5-063]. It presents improved arrangements for watering and sustaining the embankment and other planting, but these do not address the fundamental criticisms made by SHH of the earthwork planting and other aspects of the landscape design.

9.5 SHH made detailed submissions on the inadequacies of the Design Code, including the need to define accurately the minimum size parameters for the earth bank and set clear construction carbon commitments in SHH 53 [REP5-135]. SHH's final responses to the Design Code are in SHH 69.

## **10. Carbon**

10.1 At Examination, SHH has continued to challenge the Applicant's Strategic Carbon Assessment and ES Chapter 10 Carbon.

10.2 SHH's review of the revised Strategic Carbon Assessment is in SHH 48 [REP5-135]. This review demonstrates that, while there may be marginal carbon savings from transport emissions by promoting housing on the existing works site, when compared to the counter-factual suburban location, these can only be tentatively estimated based on limited data. For the reasons explained in SHH 48, no carbon savings can legitimately be claimed in terms of buildings emissions at North East Cambridge as against the counter-factual.

10.3 The Applicant belatedly assessed the carbon emissions from the demolition of the existing Cambridge works, following the submission of SHH's assessment in SHH 06 [REP1-172]. The Applicant has not included this as requested in Chapter 10 of the ES. The Applicant's assessment of around 4,000tCO<sub>2e</sub> is, however, accepted.

10.4 SHH and the Applicant agree that extending and improving the existing works would give rise to substantially lower construction carbon emissions than the proposed relocation. SHH's estimate of 17,000tCO<sub>2</sub>e for this should be compared to the Applicant's assessment of 53,000tCO<sub>2</sub>e for the relocated works in Table 4.1 of the ES Chapter which is now at Revision 6 [REP6-019].

10.5 The Applicant has not accepted SHH's reasonable request in Section 3.7 of SHH 53 [in REP5-135] that it should set a more stringent target of 34,800tCO<sub>2</sub>e for construction of the new works. The Applicant has committed to 43,530tCO<sub>2</sub>e. Even the SHH target would still fail the Applicant's capital carbon reduction target of 70% below 2010 levels.

10.6 SHH remains of the view that the Applicant's Biomethane Export option is unlikely to be feasible or commercially viable and the ExA should assume that if the DCO is granted, the Applicant will pursue the CHP Option.

10.7 SHH's final position on carbon is summarised in Section 5 of SHH 63 Note of Oral Submissions at ISH4 and in SHH 69. The Applicant should be required to commit to net zero operational emissions, under both the CHP and biomethane options, including all activities on the site and directly related to it, without using carbon offsets or credits. The obvious way to achieve this is to require the Applicant to deploy sufficient solar generation on site for both the CHP and biomethane options to deliver net zero.

## 11. Environmental Effects and Mitigation

11.1 The Environmental Statement fails to set out an adequate assessment of the 'main alternatives' as required by the EIA Regulations. It remains deficient in that it did not consider the demolition and remediation of the existing works site as part of the project or cumulatively.

11.2 SHH has made extensive submissions to the Examination and at hearings, challenging the content of the ES, including the assessments of significant effects and the mitigation proposed, in RR-035, SHH 04 [REP1-171] and subsequent submissions. SHH has engaged with the Applicant in seeking changes to the Management Plans, where these are needed to ensure the delivery of adequate mitigation.

11.3 SHH agrees that many of the errors and omissions in topic sections of the Environmental Statement, including the findings of the ES Transport Chapter 19 and supporting transport assessment, have now been corrected by the Applicant by numerous revisions in the course of the Examination. SHH's outstanding concerns about transport matters are set out in SHH 64, which the Applicant agreed at ISH5 to address in submissions at D7.

11.4 Outstanding technical assessments, which include the Flood Risk Assessment, water quality assessment and final effluent standards, are still with the Environment Agency for review and have yet to be accepted.

11.5 SHH has demonstrated that, in particular, the significance and severity of the residual effects in relation to certain topics, notably Green Belt, historic environment, landscape and visual impacts have all been underestimated by the Applicant in the ES.

11.6 NPPF para 206, states that 'any harm to the significance of a designated heritage asset should require clear and convincing justification.' The Tables presented by the Applicant in REP5-068 demonstrate that multiple historical assets including conservation areas and listed buildings will be harmed both during construction and post construction operation of the PD. SHH's conclusion is that

while, taken together, that the harm to heritage assets is 'less than substantial', it is at the higher end of that range. This accords with the professional evidence given on behalf of SCDC, as the relevant local planning authority. See RR-035 section 10.4; REP1-171 section 10.4.2;10.4.2.1; SHH55 REP5-135 sections 2-5.

11.7 SHH presented detailed appraisals of landscape and visual amenity effects in evidence. There will be radical changes to the open landscape character, caused both by the built development and the landscaping proposed. These are moderate adverse significant effects, which will be 'permanent', an assessment which the Applicant agrees with. SHH's evidence is that the adverse visual effects of the development, at many viewpoints, will remain significant at Year 15. These are permanent ie long term effects, which will be most obvious in winter. SHH has asked for denser planting and other measures to ensure that the embankment planting could be more effective, as well as more advance planting around the site boundaries and at certain off-site locations. Although the Applicant has clarified the arrangements for watering and managing the embankment planting, no changes to the landscape design have been made by the Applicant. See RR-035 sections 10.5, 13.3; REP1-171 section 10.5; SHH56 REP5-135; SHH61 [REP6-135](#).

Deleted: REP5

11.8 SHH welcomes the Applicant's late concession to make the new bridleway along the old railway permanent, but considers that in order to sufficiently mitigate the harm of the proposed development, the Applicant should commit to maintaining the landscaped areas and allowing recreational use of the land it will control around the works not for 30 years but for the 'lifetime of the works'. It should also allow public use of parking on site. The Applicant has stated that it intends to amend the draft s106 agreement to take account of concerns by SHH, QFT and other parties about mitigating recreational pressures on the wider countryside including Quy Fen SSSI, but SHH has not yet seen the final draft agreement.

## 12. Funding and Deliverability

12.1 SHH's long standing concerns about the certainty of funding and hence the deliverability of the relocation have been set out in submissions. See Section 11 of RR-035, Section 11 of SHH 04 {REP1-171} and SHH 22 [REP3-068], in particular. Although the Applicant has provided many of the HIF Business Case and other documents in redacted form to the Examination, many of SHH's forensic questions have never been answered. The problem arises, principally, because the HIF Grant, a fixed cash sum at 2018 prices, is tightly restricted and unlikely to be sufficient, and the Applicant cannot call on revenues from its regulated business to meet any shortfall. The Applicant's Funding Statement [REP4-109], did not deliver the necessary assurances required by the Compulsory Acquisition Guidelines.

12.2 The Applicant has provided a radically revised Funding Statement at D6 [REP6-003], increasing the overall funding budget by some 63%. The implications of this in particular is that it substantially undermines the Applicant's reliance on the 'planning case' for enabling housing development in accordance with the NECAAP 'vision'. SHH's response is set out in SHH 67.

12.3 SHH's position, based on a proper reading of the Compulsory Acquisition Guidelines, is that the DCO, in particular, the Compulsory Acquisition powers, should not be granted unless the Applicant can confirm, before the close of the Examination, that full funding for the project, including that required to cover cost inflation, over and above the HIF Grant, is likely to be available. It is not

sufficient to make this a Requirement to be fulfilled after grant of the DCO, but before the CA powers are exercised.

### 13. Draft DCO

13.1 The Applicant has yet to submit a final draft DCO. SHH made requests for drafting changes to the dDCO, principally in Article 6, Schedule 2, Schedule 14, the relevant plans and to the Design Code in SHH 40 and elsewhere. Some of these have been met. Requests for changes to the CTMP and OLTP were made in SHH 64 and at ISH5.

13.2 SHH's outstanding requests, where these are important, are set out in SHH 69.

### 14. Overall Planning Balance

14.1 This application falls to be determined under s105 of the Planning Act 2008. The application does not meet crucial policies in the NPPF or the adopted local plans and great weight should be given to this by the ExA in making a recommendation.

14.2 There is no operational need for the relocation, as accepted by the Applicant and no policies requiring relocation in the adopted local plans. The emerging local plans do not require relocation, are at an early stage in preparation and will require substantive review and amendment before they can proceed to scrutiny at Examination. The proposals for North East Cambridge in NECAAP are flawed and will be challenged. The housing requirements in the GCLP First Proposals can sensibly be met on other identified sites in Greater Cambridge. Little weight should be given to the emerging GCLP and NECAAP.

14.3 The Applicant can cite no other DCO, where enabling the redevelopment of the existing site of that infrastructure was the principal justification for the DCO.

14.4 The Applicant needs to establish 'very special circumstances' exist to overcome the harm to Green Belt, as set out in the NPPF paras 152 and 153 and the NPSWW para 4.8.14. The latter makes clear that *"very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the decision maker will attach substantial weight to the harm to the Green Belt when considering any application for such development"*. The development is inappropriate development and will cause substantial or 'very high' harm to the Green Belt.

14.5 Although the PD results in 'less than substantial harm' to heritage assets, this harm must be given 'great weight' as noted in para 205 of the NPPF.

14.6 Other harm has been identified by the Applicant and summarised in para 6.1.7 of the Planning Statement [REP1-049]. SHH's evidence is that the Applicant's assessment of harm to heritage assets, impact on landscape and visual amenity have been underestimated and impact of significant adverse effect on HCLA22 under-reported in the summary of 'other harms' in the Planning Statement. SHH agrees that all the other harms are correctly listed by the Applicant in para 6.1.7.

14.7 SHH disagrees with the Applicant's claim that there are ten direct 'planning benefits' of relocation, in para 2.2.17 and para 6.2.13 of REP1-049. The claimed benefits are overstated and should be given little weight in the planning balance. The table below has been updated from that included as Table 7 in SHH 04 [REP1-171] to take account of subsequent submissions to the Examination by the Applicant, SHH and other parties. Taken together, these do not constitute sufficient benefits to create 'very special circumstances'.

Benefit claimed	Accuracy of Applicant's claim	Achievable on existing site by consolidating and/or enhancing existing works	Normal requirement for grant of consent for new waste water facility	Specific DCO 'mitigation'	Weight to be accorded to claimed benefit in SHH's view
Modern low carbon waste water treatment facility	No evidence that 'state of the art' technology is to be used. PD does not achieve 70% capital carbon reduction target. Existing works could be upgraded with much lower carbon emissions	Yes	Yes		The unnecessary capital carbon emissions from relocation are a dis-benefit
Improving storm resilience	Marginal improvement through use of transfer tunnel. Transfer tunnel only provides 5,000 cu metres of storage.	Yes, additional storm water tanks could be provided on existing site	Yes		Limited
Improving quality of recycled water returned to River Cam	Marginal improvement over existing, but not verified by Environment Agency. Discharge standards being set are not stringent enough	Yes	Yes		Limited
Restore and enhance surrounding environment (biodiversity)	Biodiversity target low given proposed site is arable farmed land. Ignores biodiversity loss from redevelopment of existing site		Yes, if dealt with as planning application	Yes, offered by Applicant	None
Maximise public value and support circular economy	Works produces products eg sludge and greenhouse gases, which have to be recycled, as is done at existing works.	Yes	Yes		None
Operational and capital cost efficiencies and carbon cost reduction	No evidence of operational or capital cost efficiencies of combined provision. The only feasible option, CHP, does not achieve genuine operational net zero target on site, including activities based at site, excluding offsets.	Yes. Piping Waterbeach effluent to existing works and further carbon emissions reductions at existing works can achieve this.	Yes		No evidence to support capital cost efficiencies of combined provision.  None
Improve access to countryside	Minor improvement to public bridleway network.			Yes, offered by Applicant	Limited
Enhance education	Small unproven benefit.	Yes		Not required as part of the DCO	Limited
Enhance recreational opportunities	Public use of land around works constrained by absence of parking and failure to commit to long term public access.			Yes, offered by Applicant	Limited



Benefit claimed	Accuracy of Applicant's claim	Achievable on existing site by consolidating and/or enhancing existing works	Normal requirement for grant of consent for new waste water facility	Specific DCO 'mitigation'	Weight to be accorded to claimed benefit in SHH's view
Socio-economic benefits during construction	These have never been articulated or quantified by the Applicant	To an extent			Limited

## 15. Conclusion

15.1 Having considered all of the evidence, the ExA is asked to recommend to the Secretary of State that the application for the Cambridge Waste Water Treatment Plant Relocation Order be refused.

### Appendix A List of Submissions Made by SHH to the DCO Examination

SHH Doc. No.	ExLib No.	SHH Title	PINS Title
SHH 01	RR-035	Save Honey Hill Relevant Representations	Save Honey Hill Group
SHH 02	PDA-003	Procedural request – Timetable change	PM SHH Request for Change of Timetable Save Honey Hill Group
SHH 03	REP1-175 Rep1-176	Video, pro-forma. Video transcripts	Written Representations (video) Written Representations (video transcript)
SHH 04	REP1-171	Save Honey Hill Written Representations	Written Representations
SHH 05	REP1-172	Save Honey Hill Written Representations Appendix A: Health Survey Methodology & Results	Written Representations (appendices)
SHH 06	REP1-172	Save Honey Hill Written Representations Appendix B: CUED Greenhouse Gas Emissions Accounting for Demolition CWWTP	Written Representations (appendices)
SHH 07	REP1-167 REP1-168	Request for Additional Locations to include in Accompanied Site Inspection (ASI) & wish to attend	Notification of wish to attend ASI Comments on ASI locations
SHH 08	REP1-172	Save Honey Hill Written Representations Appendix C: Design Critique	Written Representations (appendices)

SHH 09	REP1-173 REP1-174	SHH Appendix E Additional reference documents: Darwin Green JDCC 18/10/23 Brookgate	Written Representations (supporting information)
SHH 10	REP1-172	Save Honey Hill Written Representations Appendix D: Maps	Written Representations (appendices)
SHH 11		SHH Request to Applicant for Amendments and Clarifications to dDCO and Plans as introduced at ISH1.	
SHH 12	REP1-169	ISH1 dDCO SHH Summary of Oral Submissions FINAL 061123	Summary of Oral Submissions at ISH1
SHH 13	REP1-170	SHH Summary of Oral Submissions re Principle of Development at ISH2	Summary of Oral Submissions at ISH2
SHH 14	REP1-172	Save Honey Hill Written Representation Appendix F Summary	Written Representations (appendices)
SHH 15		SHH Response to SoCG Rev 01	
SHH 16		Not used	
SHH 17	REP2-058	SHH Covering letter	Comments on responses to ExA's ExQ1
SHH 18	REP2-059	SHH Comments on SCDC Responses to ExQ1	Comments on responses to ExA's ExQ1- 2
SHH 19	REP2-065	Comments on Cambs. County Council LIR	Comments on Local Impact Report - 1
SHH 20	REP2-066	Comments on SCDC LIR	Comments on Local Impact Report -2
SHH 21	REP2-064	Comments on City Council LIR	Comments on Local Impact Report
SHH 22	REP2-067	HIF Grant Conditions Submissions	Comments on any submissions received at D1-part 1
SHH 23	REP2-068	Comments on Errors and Omissions in Planning Statement	Comments on any submissions received at D1-part 2
SHH 24		SHH 11 Updated to Reflect dDCO at Rev 05	
SHH 25		Request for Changes to Schedule 2 Requirements	
SHH 26	REP2-060	SHH Comments on EA responses to ExQ1	Comments on responses to ExA's ExQ1- 3

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SHH 27	REP2-069	Comments on Natural England WR	Comments on Natural England's Written Representations
SHH 28	REP2-063	SHH Comments on Applicant's responses to ExQ1	Comments on responses to ExA's ExQ1- 1
SHH 29	REP2-061	SHH comments on City Council Responses to ExQ1	Comments on responses to ExA's ExQ1- 4
SHH 30	REP2-062	SHH comments on County Council Responses to ExQ1	Comments on responses to ExA's ExQ1- 5
SHH 31	REP2-070	SHH comments on EA-AW SoCG	Comments on Anglian Water – Environment Agency progressed SoCG
SHH 32	REP3-067	Response to SCDC and Cambridge City Council Amendments to LIRs	Comments to comments on SCDC and Cambridge City Council amended Local Impact Report (LIR)
SHH 33	REP3-068	Response to SCDC and City Council Comments on SHH WR	Comments on any submissions received at D1 – part 2
SHH 34 SHH 34 Expd.	REP3-068 REP4-108	Comments on 8.13 Applicant's Responses on WRs Expanded as tracked and clean	Comments on any submissions received at D1 – part 2 Comments on any submissions received at D3 D4-3
SHH 35	REP4-106	SHH Response to the Applicant's Responses to Written Representations Document 8.13 [REP2-038]	Comments on any submissions received at D3 D4-1
SHH 36		Letter to Lead ExA re deferral	
SHH 37	REP3-065	Submissions for D3 and Further Submissions Cover Letter	Comments on any submissions received at D2
SHH 38	REP3-066	Comments on Applicant's Responses to LIRs	Response to Applicant's comments on Local Impact Report (LIR)
SHH 39	REP4-106	Inconsistencies & Errors in ES Ch 2 to AW (MD) 12/01/24	Comments on any submissions received at D3 D4-1
SHH 40	REP4-106	SHH Outstanding Concerns about Drafting of dDCO and Relevant Plans	Comments on any submissions received at D3 D4-2
SHH 41	REP4-109	ISH3 – Environmental Matters Day 2, 11 January 2024; Summary of Oral Submissions	Written Summaries of oral submissions made at any hearing D4-4
SHH 42	REP4-106	SHH Response to the Applicant's comments on Save Honey Hill's Deadline 2 submissions 8.14 – Sections 2.9 and 2.5 - Funding [REP3-054]	Comments on any submissions received at D3 D41
SHH 43	REP4-106	Note regarding Quy Fen and Black Ditch: Water Pollution Control and Monitoring	Comments on any submissions received at D3 D4-1

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SHH 45	REP4-109	CAH1 – Compulsory Acquisition Hearing 1, 9 January 2024: Summary of Oral Submissions	Written Summaries of oral submissions made at any hearing D4-4
SHH 46	REP4-109	ISH3 – Environmental Matters Day 1: Summary of Oral submissions	Written Summaries of oral submissions made at any hearing D4-4
SHH 47	REP4-105	D4 Submissions by SHH at D4	Description and list of submitted documents
SHH 48	REP5-135	REP3-042 Strategic Carbon Assessment Revised and Response from Applicant	Comments on any submissions received at D4
SHH 49		SoCG Rev 02 SHH proposed amendments	
SHH 50	REP5-135	SHH Response to the SCDC REP3-060 Comments on LIR Responses	Comments on any submissions received at D4
SHH 51	REP5-136	Responses to ExQ2	Responses to ExQ2
SHH 52	REP5-135	Response to Strategic Carbon Assessment and Carbon Conclusions REP3-042 REP2-037	Comments on any submissions received at D4
SHH 53	REP5-135	Response to draft Design Code REP4-085	Comments on any submissions received at D4
SHH 54	REP5-135	Comments on Hedgerow and Tree Preservation Plans REP4-021	Comments on any submissions received at D4
SHH 55	REP5-135	Response to ES Chapter 13 Historic Environment REP4-030 and Tables REP4-067	Comments on any submissions received at D4
SHH 56	REP5-135	Comments on ES Chapter 15 LVA REP4-033.	Comments on any submissions received at D4
SHH 57	REP5-135	Response to LERMP Rev 03 REP4-057	Comments on any submissions received at D4
SHH 58	REP5-135	Comments on REP4-069 5.4.19.7 Rev 05 Construction Traffic Management Plan and App. F to REP4-087	Comments on any submissions received at D4
SHH 59	REP5-135	Comments on Lighting Design Strategy REP4-048	Comments on any submissions received at D4
SHH 60	REP5-135	List of SHH submissions updated at D5	Comments on any submissions received at D4
SHH 61	REP6-135	SHH Comments on Responses to Examining Authority's Second Written Questions (ExQ2) by the Applicant, Cambridgeshire County Council and South Cambridgeshire District Council (REP5-111, REP5-118, REP5-122)	Comments on any submissions received at D5 2
SHH 62	REP6-137	ISH4 – Draft DCO and Environmental Matters, 13 and 14 March 2024: Summary of SHH Oral Submissions	Written summaries of oral submissions made at any hearing (ISH4)

SHH 63	REP6-136	SHH Responses to Examining Authority's Third Written Questions (ExQ3)	Responses to ExQ3
SHH 64	REP-134	Response to Applicant's revised Traffic and Transport submission	Comments on any submissions received at D5 1
SHH 65	REP6-133	SHH submissions made at D6	Cover letter
SHH 66		SHH Closing Submission	
SHH 67		Funding and Related Planning Matters Incl. Annex A Selected Figures from NECAAP Reg. 19 Submission Draft	
SHH 68		Written Note of Oral Submissions at ISH5	
SHH 69		Response to Submissions by the Applicant made at D6	
SHH 70		Signed Statement of Common Ground with Applicant	

**Submission by Save Honey Hill Group****Further Response to Applicant's Revised Funding Statement [REP6-002] and Related Planning Matters****17 April 2024****1. Introduction**

1.1 SHH submitted a Preliminary Response to the Applicant's revised Funding Statement [REP6-002] at D7. These are SHH 67 and SHH 67 Annex A. The time available to draft those was extremely short. This Further Response amplifies and corrects that Preliminary Response to assist the ExA in considering the implications of the Applicant's revised funding package as it relates, in particular, to the Applicant's 'planning case' for the relocation.

**2. Ownership of Land to be Sold for Early Commercial Development**

- 2.1 SHH may have made an incorrect assumption in SHH 67. We have done further research on land ownership, examining the Works Plans, the Land Plans [REP5-018] and the Book of Reference [REP5-009] and made enquiries concerning the adjacent sites in the freehold ownership of the City Council.
- 2.2 There may not be an agreement between the Applicant and the City Council that any of the land to be sold is in the City Council's ownership and therefore any land to be sold is land within the freehold ownership of the Applicant and related entities and is land within Order limits. If so, the only feasible sites for early release are on the western boundary of the existing WWTP fronting onto Cowley Road, facing the St John's Innovation Centre and Merlin Place. The Applicant asserts in the Funding Statement that the land to be sold is 'land outside the operational footprint of the works', as noted in para 3.2 (iv) of SHH 67.

**3. Area of Land Required for the Intended Early Commercial Development**

- 3.1 In para 3.9 of SHH 67, our assessment was that to support an R and D/laboratory/office development of 90,000 sq m gross would require a site of between 7 and 9 ha. The figure of 90,000 sq m is the total gross business employment floorspace on the 'core site' mentioned in the recent briefing to Councillors by LandSecs U+I. It may be the developer's intention that this is only 67,000 sq m of early commercial development, with the original 23,000 sq m still to be dispersed elsewhere on the 'core site'.
- 3.2 Making an accurate assessment of the likely land requirement necessitates a number of assumptions, one of the most critical of which is the amount of car parking to be provided, given that any application would fall to be determined under the adopted Cambridge City Local Plan, in advance of any Examination of NECAAP. The relevant Business Use parking standard is that set out in Table L7 and is, for development outside the CPZ, 1 space per 40 sq m GFA. That is not however a minimum standard.
- 3.3 The approach which the City Council and SCDC wish to adopt within the NECAAP area relies on the application of site wide trip budgets in accordance with Policy 22. It would be for individual applicants to demonstrate via a Transport Assessment how their scheme adheres to the relevant site wide trip budget. The maximum standard for residential development is being set very low at 0.5 spaces per dwelling, with that parking being provided in car barns ie multi storey parking

structures. We are not in a position to undertake a detailed trip budget calculation for the early commercial development. Instead, we have adopted an approach based on the two most relevant R and D planning permissions recently granted on Cowley Road. Although these both involve the redevelopment of existing buildings, they are immediately adjacent sites accessed from Cowley Road. We believe they are both realistic comparators. They incorporate very limited employee parking provision, which meets the terms of NEAAP Policy 22. They exclude the provision of highways or any public realm. Merlin Place, in particular, is a highly constrained 'island' site and relies on parking on the ground floor beneath the building.

3.4 The relevant data from those permissions is in Table 1.

**Table 1: Relevant Recent R &D Planning Permissions on Cowley Road**

Planning Permissions	Height of Building	Estimated Gross Floorspace (m2 GFA) and Plot Size	Plot Ratio, including 10% allowance for access roads or public realm	Employee Parking Provision
Vitrum building, north of St John's Innovation Park 23/01487/FUL and 23/01509/FUL	6 storeys 27.2m	17,200 on plot of 0.82ha	2.1	1 space per 168 m2 GFA
Merlin Place, Milton Road 23/00835/FUL	6 storeys over parking 30.5m	13,750 on plot of 0.5ha	2.75	1 space per 305 m2 GFA

3.5 Based on the Vitrum building, between 70,000 and 90,000 sq m of early commercial development requires land plots totalling between 3.7 and 4.7ha. Based on Merlin Place, the area of plots required is 2.8 to 3.6ha.

#### **4. Land Available to the Applicant for Early Release**

4.1 The ExA should refer to Sheet 1 of the Works Plans [REP6-004], Part 1 of the Book of Reference [REP5-009] and Sheet 1 of the Land Plans [REP5-018] showing the south-west corner of the existing WWTP land within Order limits. There is no plan before the Examination showing the operational footprint of the existing works. In summary, the only land owned by the Applicant potentially available that may be non-operational, unencumbered by being outside defined works areas shown on the Works Plans and accessible from Cowley Road is land plots 006b and 006c, a total of 0.95 ha leased to Mick George Ltd as an aggregates depot. This land is owned by Anglian Water Services Ltd, the regulated business. This site is oversailed by a high voltage electricity line. Immediately to the north of this is Plot 003e and land outside limits occupied by a large mobile phone mast and base facilities, part owned by telecoms operators alongside the only HGV access to the existing works. Land to the north of the HGV access, Plots 004a to 004d, are three dwellings and adjoining land. The houses may be considered non-operational but are clearly occupied and tenanted. This land is within the limits of deviation for Work 17, but is, in any event, only 0.4 ha in total. The land to the east of this is to be used for a combination of Works 17, 18, 25 and 26, although some of this may be non-operational at present.

4.2 SHH's evidenced view is that the Applicant has not got between 2.8 and 4.7ha of land available for this development that could be granted permission in advance of the DCO being determined or built until after the DCO has been fully implemented.

## **5. Core Site Land Owned by City Council**

5.1 The City Council owns three plots of land which are part of the 'core site, fronting onto Cowley Road. These are Orwell House, a tired 1980s office/business building, the operational City Council depot and the vacant former Golf Driving Range. These and the Applicant's land immediately to the North, discussed in Section 4, are intended to be the most important landmark development plots in the NECAAP vision and are the southern part of Site E on Figure 6 in Annex A. Figure 11 shows the intended development of these to be 'housing-led' including a district centre. Figure 21 sets suitable building heights as 5 to 8 storeys, but with a landmark or gateway 10 storey building on the corner. Figure 23 sets very high residential densities of between 270 and 300 dwellings per hectare on the City Council land and that immediately to the north.

5.2 We do not know whether the City Council has pledged any of this land to be the site of early commercial development.

## **6. Land Values and Sales by the Applicant**

6.1 The Applicant has not provided any sort of development appraisal that would validate the £92.1 million stated to be the minimum price agreed at heads of terms.

6.2 This value can only be assessed as a residual value following Red Book procedures. If our plot area assessment is correct, this would imply a mid-point residual land value of around £25 million per hectare. There is no published data on R & D/life sciences land values in Cambridge, but given the likely rents achievable, this value appears high and is an open market value for a free standing development that accords with the adopted local plan.

6.3 Ofwat regulates the sale of 'protected land' under the licences given to waste water undertakings such as the Applicant. Ofwat requires independent valuations and that at least 50% of any such sale value is, in effect, returned to the customers of the regulated business, by reducing the undertaker's regulatory capital value. The Applicant has provided no evidence that Ofwat has approved or considered any advanced sale of land on the existing WWTP site for the early commercial development.

## **7. Conflict of Early Commercial Development with Vision and Policy in NECAAP**

7.1 This Further Submission updates and corrects the submission made in SHH 67, but fully reinforces the conclusion which was drawn in Section 4 of SHH 67. If the early commercial development goes ahead, it will not be in accordance with the vision and wider policies set out in extant Regulation 19 draft of NECAAP. For example, Policy 23 explicitly requires there to be a 'comprehensive and coordinated development'.

7.2 There will need to be quite radical rethinking of the entire NECAAP spatial vision and policies. Without sight of an updated master plan, we cannot be certain, but it is highly likely that the 5,500 dwellings planned for the core site will have to be substantially reduced. This would be contrary to the purposes of the HIF grant, which is principally to expedite the delivery of a sustainable housing led development on the core site. The decision to pursue early commercial development also brings into question the ability of the local planning authorities to impose their vision on other landowners within the NECAAP area, a point SHH has already made strongly in evidence.