

**From:** [Lieran](#)  
**To:** [Cambridge Waste Water Treatment Plant Relocation](#)  
**Subject:** Regarding: <https://infrastructure.planninginspectorate.gov.uk/document/WW010003-002956>  
**Date:** 10 September 2024 10:46:24

---

You don't often get email from [REDACTED]@hotmail.co.uk. [Learn why this is important](#)

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Email: [REDACTED]@hotmail.co.uk

Tel: [REDACTED]  
[REDACTED]

Date:  
10.09.2024

To

[CambridgeWWTPR@planninginspectorate.gov.uk](mailto:CambridgeWWTPR@planninginspectorate.gov.uk)

To whom it may concern,

**My Interested Party Reference Number is: CWWT-S570845**

Regarding: <https://infrastructure.planninginspectorate.gov.uk/document/WW010003-002956>

Please see below my original objection, written 19 July 2023. to the proposal to move the existing Cambridge Waste Water Plant Relocation (CWWTP) from Cowley Rd site to Honey Hill and my reasons behind it.

Forgive me please for any inconsistencies in the below from the latest plans/arguments. I am in [REDACTED] and sometimes struggle to formulate ideas/communicate as well as I once did; all on top of health/family obligations.

Whilst these recent papers have been submitted, they look only at the space of the existing plant and there seems no logical, holistic overview STILL, to a transfer of the site to Honey Hill, and the overall impacts thereof. Yet, only today I hear on the radio, the need to offer land locally to gypsy and traveller communities is being blocked given their impact on

the surrounding green belt. How does all this make sense in the context of these plans, when this proposal is to destroy existing green belt by the move to Honey Hill?

Also, questions are being asked as to schools etc, of which we have a Primary just down the road, that we fear will have to move if the planning goes ahead. This would involve many residents having to drive etc to take their children to school unnecessarily, making the current road even worse in terms of traffic movement at peak times and only add to general pollution etc.

Can I assume as a property owner in [REDACTED], that should these plans go ahead, I am within my rights to sell off land that currently sits within my 'estate/garden' for development purposes? I looked into this a while ago, and am still in the process. Originally, I asked, as I have a [REDACTED] for whom I wished to build an extra completely accessible property at the bottom of my plot, but understood it as a clear 'no', as technically it is green belt land... But if this move goes ahead, there are a number of neighbours who would do the same and how can you argue against the concept?

Too many residents of Cambridge see the City's current plans to remove various retail outlets in favour of the big Biochem developments as a way to send those who have lived here for years out – 'social status cleansing?'. This has got to stop. Most people here are also being 'outpriced' of our homes. As it is we see so many long-standing unused office spaces.

Equally, we see our roads dug up for cycle paths that very few people actually use. Whilst this is not an argument I hold for Horningsea Rd, given the Primary School, I certainly do regarding the developments from Waterbeach to Cambridge on the A10. It is incredibly rare to see people using it. Is this the best use of government funding? No. It is completely flawed and who is being held to account?

A cycle path from Fen Ditton to the Science Parks via the A14 to Milton Rd would help circumvent a long cycle to a place of work without the use of a car, if these developments go ahead. Who will look into or authorise this?

.....

Letter originally written 19 July 2023.

### **Rationale for the project is seemingly flawed**

In consultations on this proposed project, Anglian Water is said to have admitted that there is no operational need for the existing CWWTP to be moved. 6 years ago £21 million was invested in that site with the promise that this investment was to 'future proof the site for the generations to come' and that the upgrade 'would be sufficient for the capacity of the area to 2050'. It is currently a fully-functional facility.

The current CWWTP is 40 hectares and has room to expand. If further development is

required, why not do it there, especially considering the new proposed site at Honey Hill is only half that size (22 hectares). What consideration has actually been given to keeping the plant where it is, aside from residential/business development and its proximity to Cambridge North Station?

### **The need for more housing**

This Planning proposal would not seem to justify the financial and other 'cost' implications involved.

It is understood that there is considerable pressure on Cambridge, both in terms of the Government's prior announcement and the city's growing population, to build more homes.

The Cowley Road site is slated to offer a development opportunity on brown belt land. The premise is to build 8,000+ new homes and 'grow' this NE Cambridge area, which benefits from the fairly recent addition of Cambridge North Railway station. However, there would seem to be a considerable number of significant downsides to the idea, not least the implied density of the proposed development. If there were to be around 225 people per hectare, this area would be as high if not higher in such than the densest cities in the developed world, higher even than Inner London. This is not taking into account any promises of 'green' and/or 'community' spaces that must, by today's planning standards, be factored in.

The Housing Infrastructure Fund allocated £227 million to relocate the CWWTP in order presumably for the brown belt site to be developed as above. However, given that this sum was calculated a good number of years ago, it is surmised that the money would not be sufficient to build a new works in today's economic environment of sharply rising inflation and interest rates. This, in turn, is being reflected in the steep hikes in material and construction costs witnessed in the past couple of years (circa 20%?). Has a new cost analysis been done with this in mind, to include both all necessary works on both CWWTP as it is and the Honey Hill proposal? If more money is not to be found for the project from elsewhere, the argument stands that Anglian Water have a vested interest in making the new works as cheap as possible and adhering only to the most stringent and comprehensive of planning conditions. They should not, it should be argued, spend additional company funds on a site in a move that they themselves have deemed unnecessary if that were to impact in any way whatsoever on the end users' water bills at a time when the cost of living is ferociously rising.

On a layperson's examination it would seem that 'corners are being cut' at the planning stage of the Honey Hill relocation. The digestive towers are not being sunk into the ground and will stand at 26m above ground. Why not? Is this a cost issue or is it due to the nature of the soil (clay / chalk aquifer) which makes it unsuitable for the sinking of structures that would be common practice in the building of infrastructure of this kind? If the latter is the case, why was this location not discounted from the start?

The complex as it is currently planned will most certainly cause a 'blot on the landscape' and an 'eyesore' for the surrounding villages, and blight a currently open, flat fenland greenbelt landscape. Insofar as I am aware, only a 5m bund is proposed to 'disguise' the plant in general, and there is no written indication that mature trees (which are costly both to purchase and transport) will be planted to help mitigate the issue. Whatever is done in this regard would not stop the plumes of burning gases from the towers being noticed from all around the local area either.

### **Lack of holistic planning for the area in general**

The argument has been mooted that the move of the treatment works to Honey Hill is needed to increase capacity to serve new developments in the area.

My response considers the following as presumably being part of this wider consideration

Waterbeach New Town (the old Barracks site, hereinafter referred to as WNT) and the renaming of Waterbeach to Waterbeach Village (hereinafter abbreviated to WV)

The Marleigh Development on the old Marshalls site off Newmarket Rd

The proposed NE Cambridge development on the Cowley Rd site

The primary consideration (and noted as a planning premium) was to provide WNT with a means of sewage disposal, given that the way the old barracks processed this on site would not be 'fit for purpose' for the new development. Here, one might argue the case for taking the WWTP site to Honey Hill, were it not for the fact that the WNT will be inhabited well before the new treatment works is up and running. As a result of this timeline issue, sewerage will still have to be taken to the existing Cowley Rd plant (meaning a new pipeline or running it somehow into the existing channel from WV) and then piping it to Honey Hill at a later date. Presumably this would be a good number of years thereafter, depending on the timeline of the final (and successful tbc) Planning Permission stage through to the end of Construction Phase. This would also have to incorporate presumably the completion of all necessary checks and contingency testing to the satisfaction of all relevant agencies.

It would then be necessary to create a channel/transfer tunnel to bring the sewage from the existing CWWTP to Honey Hill when it is ready to 'accept' it. This would involve more construction and environmental upheaval, with the risk of potential pollution in how it traverses the river Cam. Given that the Cowley Rd complex is nearer to WNT, would it not make better sense to divert the effluent and treat it there were the plant to be upgraded if

Necessary to accommodate the increased capacity?

### **Environmental and eco 'cost'**

Honey Hill sits on greenbelt arable land, which in the past the council went to great pains to protect.

It is as yet unclear what concrete efforts will be made to safeguard this area in terms of it being a wildlife habitat and to ensure the prevention of any adverse effects on protected species in the area.

Would the pipelines WNT- Cowley Rd CWWTP, and Cowley Rd CWWTP - Honey Hill not need to disrupt greenbelt land during the installation phase or thereafter?

The carbon cost of preparing the Honey Hill site and constructing the Plant has presumably been thoroughly determined and documented at the Planning Stage. However, I understand that the carbon cost of the demolition of the existing site has not (Anglian Water have admitted that the redevelopment of the NE Cambridge site does not come under their remit, and that a/another developer would have to calculate any additional carbon emissions when submitting independent plans for the site).

Making the Cowley Rd works fit for purpose as a housing etc development will surely (when looked at holistically) make the plans to relocate to Honey Hill unjustifiable? This new carbon footprint calculation must include the figures relating to the removal of vast amounts of concrete from the existing site; the complete decontamination process; and future construction considerations.

There is also a valid consideration here under the 'Sustainability' category - that of the process the site must undergo to make it safe for human habitation. I refer interested parties to compare the problems incurred at the Schering/Bayer/CropScience Ltd agrochemical plant in Hauxton, where development was refused until it could be proven to be safe. This involved a far deeper excavation of the soil than previously thought, and a greater time lapse from beginning the decontamination process to the go-ahead to build. The same happened during the construction of the Olympic Park in East London, where decontamination of the land took considerably more time, effort and money than was initially envisaged or probably budgeted for.

It should be noted that this decontamination process is not only lengthy, but it releases a toxic smell into the air which will likely be stronger than any current smell from the functioning plant.

These carbon cost considerations come at a time when Cambridge City Council is making commitments to being 'green', and proposing a congestion charge in response to the growing need to *reduce* emissions, not *increase* them exponentially. Complaints are also being reviewed as to the use of wood burning stoves in more densely populated areas of the city, given the known detrimental effects smoke can have on those with breathing difficulties or skin diseases. How then was the Honey Hill proposal allowed to even get off the starting mark?

Positioning the new site so close to the river must surely pose the risk of flooding if the

marshland is incorporated into the planning of the sludge beds and any tertiary treatment areas. Whilst heavy rainfall is not a common phenomenon of this area, what assurances can be given that this could not happen and that no groundwater contamination at Honey Hill could result? What answer is given to the fact that DEFRA advises that principle chalk aquifer (the composition of the land of the proposed site) is at high risk of such groundwater contamination. Assurances must therefore be given that pollution of nearby land and ditches is prevented and no escape of sewage could occur during the transfer of sewage from Waterbeach or from the current CWWTP.

What impact might this proposal have on Wicken Fen and Cambridgeshire Dykes? Is this within the scope of the Environmental Impact Statement and if not, why not?

It should be enforceable that both odour and noise from the new plant is non-existent/unnoticeable within the residential vicinity under any and all atmospheric conditions.

The idea of an environmental education centre focusing on all the current 'buzzwords' must be conditioned by Planning Consent to come into fruition, not dropped as a 'nice to have' if the funding gets too tight. Equally the promises of the general public still being able to access the site for walking etc must be evidenced as well as the benefits of a completely new construction, such as the recovery of essential nutrients, green energy-generation etc

### **Risks to health**

The risks to health in the dismantling and decontamination process of the old site should not be underestimated, either for the workforce or the local residents. It will be a highly disruptive period and, as alluded to above, unnecessary endeavour that will be followed by the disruption of future construction works on the site.

Whilst any escape of gas, toxin/bacteria/parasite/viral spread is a potential risk for any WWTP, the risk of disturbing a functional site coupled with the additional transportation of sewage sludge does not seem a rational risk to take if all factors are clearly weighed up in this wider argument. How would such risks be eliminated?

What contingency plans will be put in place were there to be a serious incident/contamination at/from the new facility, again keeping the proximity of small children paramount in this regard (Fen Ditton Community Primary School) and noting that some people in Horningsea still draw their water from wells...

### **Access to and from the new site**

The road that runs from WV through to East Barnwell (B1047 to meet the A1303 and onwards) is already incredibly busy, so much so that to exit or access the houses on or just off this road, especially Horningsea Rd, takes 10+ minutes at busy times. It is used as a 'rat-run' for drivers coming from Ely to Cambridge that wish to avoid part of the highly congested A10 and the subsequent delays at the roundabout; as well as many exiting the

A14 to head into Cambridge itself. It becomes still further congested during school drop-off and pick-up times for the Fen Ditton Community Primary School. Any increased use of these roads, or impediments to its flow, would cause traffic chaos.

If correct, the plans project for 6 x 140 HGV sludge lorry movements per hour throughout the day to and from the Honey Hill site, and 12 an hour in the quieter periods at night. This will impact heavily on the already busy A14. Access to Honey Hill can be gained only via A) the Quy turnoff on to Milton Rd, which presumably is not ideal if considering the Marleigh Estate plans and those cars already using Milton Rd as a route from the A14 into Cambridge; or B) via the Fen Ditton slip road. In the case of the latter, as it currently stands, a turn onto the A14 towards the Milton Interchange involves crossing the motorway bridge and turning right across oncoming traffic. The traffic lights there that enable this and the queue of lorries waiting to turn would surely both increase congestion and jeopardise the bridge structure itself (the weight limit for which I am uncertain but not far up becomes 18 tonnes).

It would be essential that dedicated access is provided for these sludge lorry movements that does not in any way affect the current traffic issues in the area (which will only get worse once the WNT is completed and the Marleigh Estate access has been fully accounted for). Under no circumstance should any vehicle movements to and from the site come near or through any of the local villages.

### **Financial implications**

The financial costs of the necessary planning, works and construction of the new Honey Hill Site will be considerable and the £227 million allocated from the Housing Infrastructure Fund will likely be insufficient (see above).

Relocation from the current CWWTP is not operationally necessary, hence any justification to do so must be strong. The land on which CWWTP currently sits is co-owned by Cambridge City Council and Anglian Water. Can one surmise then, that Anglian Water may have been 'politically influenced' to acquiesce to a move endorsed by CCC?

It must be a matter of public record how much the land is sold for, to whom and the conditions of that sale/lease to a developer. One could argue that commercial confidentiality should not apply here (morally at least) given the clear conflict of interests given CCC as landowner and the influence they would carry over planning consent, even if placed outside of their immediate jurisdiction.

Would the land even be of interest to a developer at an 'interesting' price (a reasonable payback to the council for future investment in the city) given the contamination issues noted above; the subsequent planning and time implications and the inherent risks therein? If the site were developed, would the developer make sufficient profit to ensure the number of low cost homes are built as projected, and at no detriment to their quality or substance? It would surely be all too easy to offer less than promised and 'tone down' any mention of community/green spaces within the development.

## **Lack of sufficient public consultation**

It seems both unfair, undemocratic and unprofessional that the local community has been obliged to undertake the campaign 'off their own backs' to ensure that all residents of the affected area are both informed of these plans and 'heard' in the voicing of their opinions. This costs money, time and commitment from the residents and evidences how ineffectual the 'official' consultation process has been.

As a local resident I was informed by letters from Anglian Water as to the proposals, but it was up to me to register for the limited Zoom consultation sessions they offered at the time. Little allowance was seemingly made for those who may lack this technology or know-how. The latest correspondence I received from Anglian Water offered residents the opportunity to purchase the suite of application documents in hard copy, but for the princely sum of £3,000 plus postage!

Anglian Water claims it is 'keen' to engage more with the local community and its wider interested parties (e.g. those connected to the Fen Ditton Community Primary School), but freely admits it does not have the funds put aside to pay for this engagement.

A4 notices put up in the area were placed on posts that would never be read in that location where largely only cars would pass and drivers would not/could not safely stop.

## **A possible solution?**

Given that it would seem that the underlying reason for Honey Hill to be considered for the new WWTP is the need for additional housing in Cambridge (by way of the liberation of the current CWWTP brown belt site).

Has the option to use Honey Hill as a housing development site been looked at?

Whilst it would not solve the problem of loss of greenbelt land, which would be sacrificed anyway (contrary to national and local planning policies), it would at least be in keeping with the two surrounding villages Horningsea and Fen Ditton, where the green belt provision is somewhat sporadic amongst the dwellings anyway.

A planning condition could be placed on the development built on the location currently slated for the sewage works to minimise the environmental impact and maintain natural habitats. A new development there could, in theory, unite an already disconnected Fen Ditton (cut through the middle by the B1047) with itself, Horningsea and potentially the Marleigh site, which has already access planned to Ditton Lane/East Barnwell. This could allow for enhanced facilities, a greater sense of community cohesiveness, the preservation of public right of ways and even scope to improve the natural surrounding area recreationally and educationally, linking in the local farms, perhaps?

In light of the above, I do not believe the plans to relocate the sewage works to Honey Hill is in any way sensible or justifiable.



Best regrads,

Ms Lieran-Lynne Michelle Stubbings (Chosen name Lieran)