

Re. Application by Anglian Water Services Limited for an Order granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation project.

Secretary of State **Consultation 3** - Invitation for further Representations from all Interested Parties

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/WW010003>

Letter & Notes therein:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/WW010003/WW010003-002983-Secretary%20of%20State%20Consultation%20letter%20dated%2016%20October%202024.pdf>

All Interested Parties are invited to make representations on the content of the documents at (a) to (d) above, addressing:

- the extent to which the proposed revisions to national planning policy, in particular as regards house building and green belt, are relevant to the determination of the Application; and
- the weight that a decision-maker should attach to the proposed revisions i) while they remain in draft; and ii) in the event they become adopted national planning policy.

Interested Party Reference number: 20041345

NOTES:

References ("Refs") below are made to:

NPPF: text Draft for consultation ("NPPF24")

https://assets.publishing.service.gov.uk/media/66acffddce1fd0da7b593274/NPPF_with_footnotes.pdf

However, note that it seems very likely that "Revised NPPF may be delayed until the new year, says minister"

<https://www.planningresource.co.uk/article/1889774/revised-nppf-may-delayed-until-new-year-says-minister>

Aspects already highlighted in earlier rounds of 'Consultation' remain: Core Reasons for OPPOSITION to building on this Green Belt Land remain.

Key Points - referencing this "Consultation 3" round - are covered below.

Green Belt: The five principles of the Green Belt- Policy remains unchanged in NPPF24

Policy Restrictions on building developments on Green Belt land remain.

Building on Protected Green Belt land is unacceptable & totally inappropriate.

Conflict in Planning Policy between the development of Brownfield Sites & Protection of Greenbelt.

This is especially in the light of there being NO Reason move the Cambridge Water Treatment Plant from its Current location in Cowley Road, Milton. This was the core of the formal decision in 2008 "*Major Investment Future-Proofed that Site for decades to come*".

Land south, east and north-east of the built-up village and conservation areas both remain undeveloped - the siting of a waste water treatment plant at Honey Hill would introduce 22ha of industrialisation in undeveloped land in close proximity to the Wicken Fen Vision area (land already ear-marked & in train as part of NT Wicken Fen expansions).

Maintaining the Cambridge Green Lung extending along the River Cam.

A World Heritage Site of national importance

Ref. Section 13: Protecting Green Belt land.

Including Paragraph 139 that states "**The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.**"

Including Paragraph 144 sets out a sequential approach that must be taken in relation to Green Belt release, that being, "**give first consideration to previously-developed land ("PDL") in sustainable locations within the Green Belt, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations**".

Including Paragraph 149 & 150 Proposals affecting the Green Belt: "**Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... When considering any planning application, local planning authorities should ensure that substantial weight is**

given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

Harmful effects to Climate Change & Healthy Lifestyles

Leave the Honey Hill green space as it is, for people to continue to enjoy - NOT Industrialisation & degradation with HGVs, concrete, climate change disasters, towers in the landscape, manmade hills/earthworks etc.

Proposals to move are all counter to UK Government Policies on addressing the Climate Change emergency and protecting the Green spaces.

There is no value to anyone – be it public, nature or tackling Climate Change – to relocate a perfectly-functioning & future-proofed Waste Water Treatment plant, from its Cowley Road location.

Anglian Water (AW) states there is no operational need to move. In 2015, over £21Mn was spent on upgrading the current site, and this could be further upgraded if needed.

Where are the facts that show the benefit of moving it far outweighs the adverse Carbon Footprint of demolishing & decontaminating the current site, as well as the Climate Change aspects? (to even start to consider that site for e.g. housing).

The cost of the new sewage works at Honey Hill in Cambridgeshire is estimated to be between £370 million and £400 million - it could be far better spent in the current times, & will protect the Green Space Environment for generations of our children to come. (N.B. Note Costs have already spiralled out of control - thus smashing the budget cap of £227Mn originally set by UK Government)

Turning a beautiful fen land idyll Green Belt area of NT Wicken Fen into an Industrial site with massive Climate Change Impacts - is just not necessary. Any opportunities to enable new housing will not complete before circa 2025 - there are many other sites available for good quality, affordable housing in a much shorter time span – than involved in moving the current Cambridge Water Treatment Plant from Cowley Road.

Ref. Section 3. Plan-making - Strategic Policies

Including Paragraph 20 that states "**planning measures to address climate change mitigation and adaptation.**"

8. Promoting healthy and safe communities

Including Paragraph 94c "**enable and support healthy lifestyles**"

Including Section 2 , 8c "**an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy**".

Including 11. Making effective use of land.

Planning policies and decisions should: "**recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production**"

Including 14 Meeting the challenge of climate change. Planning for climate change.

"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures"

Conclusions

There are strong recommendations to DEFRA and the Secretary of State ("Our Ref: DCO/CWWTPR24; PINS Ref: WW010003") that this Application by Anglian Water Services, should be Rejected, with underpinning clear & evidenced reasons made concerning this Green Belt land and where there is no operational need to relocate a perfectly-functioning & future-proofed Waste Water Treatment plant, from its current Cowley Road location.

Thank you DEFRA and the Secretary of State for taking time to give careful consideration to all provided Correspondence concerning this matter.