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**From:** Wendy Blythe [REDACTED] >  
**Sent:** 13 November 2024 18:15  
**To:** Cambridge Waste Water Treatment Plant Relocation  
**Cc:** FeCRA Committee  
**Subject:** Re Secretary of State Consultation 3 – Invitation for further Representations from all Interested parties

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## Interested Party Reference number: 20041065

Dear Sir/Madam

**RE: Application by Anglian Water Services Limited for an Order granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation Project (DCO/CWWTPR24): Submission on Revisions to the NPPF**

Thank you for giving the Federation of Cambridge Residents ( FeCRA) Interested Party Number 20041065, the opportunity to respond, in relation to emerging Planning Policy specifically the proposed revisions to the National Planning Policy Framework (NPPF) and other changes to the planning system, which were the subject of a Government consultation that commenced on 30 July 2024.

Your letter lists four documents or statements relating to that consultation and invites Interested Parties (IPs) to address two questions concerning the Application

- (a) 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
- (b) 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 evidence to the DCO Examination

### Housing

#### Imposition of Mandatory National and Local Housing Targets

We understand that the proposed NPPF will calculate housing need by a new standard method. Our members are very concerned about the imposition of non-negotiable, legal targets for the numbers of houses that must be planned to be built in an area. Cambridge and South Cambs have up-to-date local plans and have been very successful together in delivering a high rate of house building.

Previously housing targets were a 'starting point' and could be modified due to constraints such as the Green Belt, Areas of Outstanding National Beauty, flood plains, agricultural value etc. But under these NPPF proposals this will no longer be the case. This concerns our members.

The December 2023 changes to the NPPF had started to rebalance the system away from developers. The majority of housing being built in Cambridge is speculative and the concern is that these government proposals will send us further into a developer-driven system where market-led housing will be prioritised over affordable housing. This is because the emphasis is on targets and the presumption in favour of development, which promotes unsustainable development outside local plans and because viability opt-out clauses will allow developers to wheel and deal their way their way out of commitments.

While it is understandable that strategic, cross-border powers may need to be increased to meet housing targets, it is crucial that local communities have a real and meaningful role in shaping the planning decisions that impact their areas. If people have no say in shaping planning policy about where they live and believe decision makers do not value their concerns they are less likely to support the behavioural changes that will be required to meet the government's ambitious targets for achieving net zero.

### **Changes to the Regime for Delivery of Nationally Significant Infrastructure Projects**

Para 26 of the CP identifies four changes being considered in relation to water infrastructure. None of these changes are directly relevant to this DCO application, which is for the relocation of a medium sized WWTP, where there is no operational or capacity justification for relocation.

### **Changes to Green Belt Policy to encourage Development of 'Grey Belt' Land Green Belt**

As we stated in our submission on the NPPF consultation, we need a planning system that includes consideration of the overall environmental capacity and climate change impact and the effect on the historic environment (built and natural) in a holistic way.

The Consultation Paper proposes complicated changes to Green Belt policy in the NPPF intended to make it easier to develop 'previously developed land' and increase the rate of delivery of housing.

Our members believe that the proposed definition of 'Grey Belt' in Chapter 5 paragraph 10 of the Consultation Paper is vague and unsatisfactory and will lead to numerous contentious applications seeking to develop land that has been deliberately neglected in unsustainable locations in the Green Belt.

We want the 'Grey Belt' category dropped as it creates too much ambiguity and risks land degradation, and to keep the current line on boundary changes in Green Belt only in 'exceptional' circumstances.

Instead of a confusing new 'Grey Belt' definition, we need a robust hierarchy that plans for use of empty homes and for conversions, then suitable brownfield, and finally, gentle density/compact transit-oriented greenfield. Local Nature Recovery Strategies (LNRS's ) should be given maximum support and protections. We also need to factor in protecting urban green spaces as well as rural. Undesignated countryside is not given enough protection in this NPPF consultation.

Our planning system should prioritise and protect our prime farmland and natural ecosystems, including water supply. This application relocates the Waste Water Treatment Plant onto a South Cambs chalk aquifer and prime farm land.

The NPPF proposals remove the obligation to consider food security and the importance of agricultural land. In our submission on the NPPF we strongly object to the deletion of 2nd sentence of Footnote 63 in the proposal "The availability of agricultural land for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development." (Questions 82/83) removal of this obligation.

The River Cam Green Belt with its top grade agricultural land is important for protecting the setting of Cambridge, a world famous heritage city. Cows famously graze on Cambridge's Commons (wetland meadows). This grazing is valuable for healthy river basin management.

In our submission on the NPPF consultation we recommend (Question 83 ) amending the definition of best and most versatile agricultural land in the NPPF Glossary to read : "Land in grades 1, 2 and 3 of the Agricultural Land Classification" In practice there is often little difference in productive capacity between 3a and 3b.

We also recommend revising the NPPF paragraph 180 (i) to read: "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services- including the food and water security benefits of the best and most versatile agricultural land, and of trees and woodland'.

Water security has already been seriously undermined by accelerating the movement of population and employment over many decades south and eastwards in England. For a whole range of reasons, economic, social and environmental, we need regional planning that reverses this trend. At the moment, simply building a few reservoirs in the south of England is not going to meet the increased demand caused by the unbalanced regional growth in housing which will be exacerbated by the uneven levels of rainfall over long periods guaranteed by climate change (Question 84).

We share the concerns of many experts that Cambridge will soon run out of water. The East of England is low-lying, not only is it subject to flooding, it is one of the driest places in the UK. Water sources are under pressure meaning people, plants and animals are competing

for the same precious resources. With climate change, drought is set to become more common amid hotter, drier summers and intense rainfall events more frequent.

Many residents are very concerned about this and about the impact on the Cam chalk streams and the wildlife that depends on them. Currently 90% of Cambridge's Water supply comes from chalk aquifers and other groundwater sources in the Green Belt. Several solutions have been put forward.

- a new Fenland reservoir – would not be delivered before 2035 and vulnerable to flooding because of rising sea levels.
- water transfer pipelines from Grafham, probably not available before 2032 if then.
- water efficiency measures including fixing leaks, reducing demand through a hosepipe ban and smart water meters.
- all major new developments required to achieve the best possible water efficiency standards (i.e less than 110 lppd)
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These steps are urgently needed in any case to ensure there will be enough water for existing users and the developments that already have planning permission.

The Environment Agency has objected to large developments such as Bourn and Darwin Green on the grounds that they are not sustainable because there is not enough water.

We support these objections and all the concerns about the level of growth planned for this region. The government must rethink its housing plans to prevent harm to the countryside and wildlife.

Professor Dieter Helm, Chair of the National Capital Committee, has stressed the importance of long-term risk assessment in ensuring net environmental gain, in perpetuity, despite development.

New communities take time to emerge, if they do at all, but the issue is that many new developments are injected into places with existing communities that may suffer as a result.

As is the case with this application.

For all these reasons  
the Secretary of State should refuse the CWWTP Relocation DCO application.

Yours sincerely,  
Wendy Blythe,  
Chair, The Federation of Cambridge Residents Associations (FeCRA)

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Chair, FeCRA

