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Contact: Claire Shannon
[REDACTED]@greatercambridgeplanning.org

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Water Infrastructure Planning & Delivery Unit
Department for Environment, Food and Rural Affairs
Seacole Building
2 Marsham Street
London
SW1P 4DF

CambridgeWWTPR@planninginspectorate.gov.uk

Electronic submission only

Dear Sir / Madam

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010 - Application by Anglian Water Services Limited for an Order Granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation project (CWWTPR): Invitation for Further Representations from all Interested Parties

Introduction

1. Cambridge City Council, herein referred to as 'CCC', acknowledges publication of the letter dated 16 October 2024, inviting further representations regarding the emerging planning policies' and their potential impact on the application for development consent for the Cambridge Waste Water Treatment Plant Relocation Project ("the Application"), submitted by Anglian Water.
2. The matters addressed are set out below:
 - 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.

The questions are addressed below.

(a) Relevance of Proposed National Planning Policy Revisions

3. CCC notes specific elements of the emerging National Planning Policy Framework (NPPF) revisions that are material to the consideration of this Application:
 - New Infrastructure and National Interests: The draft revisions to the NPPF introduce a presumption in favour of new infrastructure where it serves national interests, underscoring the importance of projects that contribute significantly to sustainable development. This principle aligns with the s35 Direction dated 18 January 2021 (Appx 3 Planning Statement [REP1-049] related to the proposed development's national significance, an assessment echoed in Chapter 7 of the draft NPPF. The Secretary of State for Housing and Planning's recent letter to Local Leaders¹, dated 23rd August 2024, the numerous references to Cambridge City in the Autumn 2024 Budget statement and the appointment letter of the Cambridge Growth Company Chair² make it clear that the city's future growth is a project of national importance.
 - Sustainable Development and Brownfield Land: The proposed revisions to the NPPF reinforce the 'golden rule' to prioritise the use of previously developed land in sustainable locations, as highlighted in Chapter 1 (paragraph 3) and Chapter 2 (paragraph 4b) and Chapter 5, (paragraph 5). CCC supports this focus on brownfield development, in particular while contributing to local infrastructure and housing needs.

Weight to accord to Building Homes Documents and Proposed NPPF Revisions

4. CCC considers both the Building Home Documents and the proposed NPPF revisions may be treated as relevant and important matters to be taken into account by the Secretary of State as decision maker under sections 104 and 105 of the Planning Act 2008. CCC considers that as draft policies they would have limited weight in relation to a decision under the Town and Country Planning Act 1990.
5. Should these proposed policies be formalised and adopted prior to a decision on the Application, then clearly their weight and potentially their relevance would depend on the final form of the policies. CCC notes that the proposed NPPF policies may be considered in the overall planning assessment, particularly concerning sustainable growth and prioritisation of new development at optimum densities on brownfield/previously developed land which the proposed WWTW relocation enables.

¹ <https://assets.publishing.service.gov.uk/media/66cdf3f68e33f28aae7e1f67/housing-minister-letter-to-greater-cambridge-leaders.pdf>

² <https://www.gov.uk/government/publications/appointment-of-cambridge-growth-company-chair/appointment-of-cambridge-growth-company-chair-letter-from-matthew-pennycook-mp>

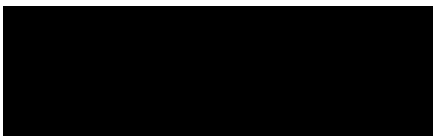
Sustainable Housing Delivery in the 'Building the Homes We Need' Letter

6. CCC also notes the emphasis on sustainable housing delivery outlined in the Deputy Prime Minister's "Building the Homes We Need" letter. This document outlines criteria for housing within green belt land but underscores the importance of a balanced approach to green belt protections to secure national housing and infrastructure priorities.

Conclusion

7. In conclusion, Cambridge City Council respectfully encourages the Secretary of State to consider proposed NPPF revisions and approach to Building Homes amplified by place specific references to Cambridge City's future contribution to UK economic growth as relevant to her decision in respect of the Application, as outlined above. This would be particularly within the broader context of sustainable development, infrastructure priorities, and local landscape integrity as they relate to the Cambridge Waste Water Treatment Plant Relocation Project.
8. The proposed updates to the NPPF do not alter the Council's position of in-principle support for the DCO, given the significant benefits enabled by relocating the Cambridge Waste Water Treatment Plant and regenerating the surrounding, underutilised, previously developed land, where potential for redevelopment has effectively been sterilised, as outlined in the Council's LIR and other submissions to the DCO examination.
9. CCC believes that the draft NPPF's explicit emphasis on prioritising the efficient redevelopment of brownfield land as part of realising the national priority for sustainable housing and economic growth, and for balancing green belt protection with the realisation of those national priorities, coupled with the specific national focus on Cambridge's growth provides an updated and material context for the Secretary of State's consideration of the proposals.

Yours faithfully



Stephen Kelly

Director of Planning & Economic Development

On behalf of Cambridge City Council