



The countryside charity
Cambridgeshire
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Secretary of State for Environment, Food and Rural Affairs
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13th November 2024

Letter sent by email to:
Cambridge Waste Water Treatment Plant Relocation
<CambridgeWWTPR@planninginspectorate.gov.uk>

Dear Secretary of State,

Ref: WW010003 Application by Anglian Water Services for an Order Granting Development Consent for the Cambridge Waste Water Treatment Plan Relocation. Response to Secretary of State's Letter dated 16th October 2024. Interested Party Reference No. : 20041224.

CPRE Cambridgeshire and Peterborough, CPRE, is the local branch of the countryside charity which campaigns to protect Green Belts and prevent urban sprawl. Our remit is also to protect and enhance greenfield land, natural landscape, rural villages and to campaign on local and national planning issues where potential for harm is perceived.

CPRE has previously objected to this application and presented its objections to the Public Inquiry in October 2023. Copies of our letters of objection and the summary of our presentation are available on the Planning Inspectorate's website. CPRE has also responded to your request dated 19th July 2024 for reactions to additional information provided by the applicant which included a Cumulative Impact Assessment.

CPRE maintains its strong objections to the Anglian Water proposal to relocate the Cambridge Waste Water Treatment Plant (CWWTP) from its present site at Milton to Honey Hill in the Cambridge Green Belt.

CPRE strongly endorses the responses made to you by the Save Honey Hill Group and the Friends of the Cam.

Background

Your letter of 16th October 2024 invited further representations on Emerging Planning Policy and referenced four relevant publications:

- a. The Deputy Prime Minister's statement to the House of Commons entitled 'Building the Homes We Need';
- b. The Deputy Prime Minister's letter to all local authorities in England entitled 'Playing your part in building the homes we need';
- c. The publication of a revised draft of the National Planning Policy Framework ('NPPF'); and
- d. The launch of a consultation entitled 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system.'

You invited Interested Parties 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.

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Our representations are as follows.

Sustainable Development. All of the above documents make reference to Sustainable Development, but is there really any such thing? All building and construction require increasingly scarce mineral resources. The manufacturing processes for materials such as bricks, glass, plaster, cement and tarmac are major energy using and greenhouse gas emitting processes. The bulk of these materials, including basics such as bricks, now have to be imported to the UK. How can that be described as sustainable?

Sustainable development surely includes making maximum use of existing structures and infrastructure. In the case of housing this should mean minimising new housing on greenfield sites and maximising the refurbishment of empty homes and existing buildings. Yet we can find only one reference to empty homes in any of the above documents and that is footnote(51) on page 38 of the draft NPPF. A footnote to sustainability when mankind's greatest threat is climate change, we ask?

It is CPRE Cambridgeshire and Peterborough's view that prioritising re-use of empty homes as well as brownfield sites should be reflected more clearly in the revised NPPF.

In the case of infrastructure, such as the recently re-furbished and fully operational Cambridge WWT, does this not mean maximising the life of the existing plant and structures, rather than building new ones on prime farmland in the Green Belt?

Housing Supply. CPRE recognises that there is a housing crisis in this country and a shortage, especially, of properly affordable housing. However, building on our comments above, the most rapid and sustainable method of tackling that crisis is to first bring the c. 1 million empty homes back into use not to build new houses on productive farmland such as exists around Cambridge, much of which is Grade 2 and 3a.

In 2016 analysis carried out for CPRE by Glenigan consultants available in the report, "Brownfield comes first", showed that projects of 50 or more units on brownfield land started on site 14 weeks earlier than on greenfield sites, and were completed 47 weeks earlier. So, when the two are combined, larger brownfield sites were being developed, from start to finish, more than a year faster than greenfield sites.

Brownfield sites can usually be developed more quickly than greenfield sites and emit less greenhouse gas per house because land levelling has taken place and much infrastructure such as drains, conduits, electricity supply, gas supply, roads and pathways can be re-used.

In 2020 the CPRE annual brownfield report, "Recycling our land: the state of brownfield report, 2020", revealed there was enough brownfield land for 1.3 million new homes and over half a million already had planning permission.

In 2022 the CPRE "State of Brownfield Report" showed that available brownfield land increased by 17% in the period between 2018 and 2022 with 23,000 sites, totalling over 27,300 hectares, with the potential for 1.2 million homes. The small piece of good news was that it appeared that some of the brownfield sites reported in 2020 had been recycled.

There are few brownfield sites around Cambridge and the current WWT site is not one of them. It is an active infrastructure site with a long life. Therefore, it is CPRE's contention that in order to solve the housing crisis most rapidly with minimum greenhouse gas emissions, government should be concentrating on regeneration of those, often deprived, areas where large numbers of empty homes do exist.

Housing Need. It is clear from the Deputy Prime Minister's Statement, (sixth paragraph) and the proposed NPPF, para 62, that the basis of housing need calculation should revert to the "Standard Method". This does not take into account employment-led projections such as those which have been used by Greater Cambridge planners to boost housing numbers in the draft Greater Cambridge Local Plan, (GCLP). The Standard Method calculation reduces the housing need in Greater Cambridge from 2,463 housing units per year to 2,224. These numbers can be met from sites already designated in the 2018 Local Plan, which did not require any change to the CWWTTP.

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Clustering. The pressure for continued development in Cambridge remains predicated on the idea that industries such as life sciences and information technology need to be 'clustered' in order to be globally competitive. There are two problems with this assumption.

Firstly, 'clustering is an outdated, 1960's, approach to R&D development which occurred when there was no telephone conferencing and no internet and members of multi-national organisations had to fly and drive to all off-site meetings. The first such cluster was the IT cluster around Route 101 north of Boston, Mass., USA.

Secondly, Cambridge is a minnow in global cluster terms. If the UK wants to compete with global industry 'clusters' it must be large enough to take on those like the Research Triangle in North Carolina, USA, which covers a large geographical area of fourteen counties, with three universities. This area is similar to the area of Northern England and the Midlands combined. To compete, the UK with its many world-class universities needs to act as a single 'cluster', not rely on Cambridge on its own with an occasional joint project with Oxford.

Clusters are only mentioned once in the revised NPPF, para 85, and then only as an observation, not as a major policy objective for national R&D. It is not mentioned by the Deputy Prime Minister. So, one has to ask why is it being allowed to drive scientific industry and housing demand around Cambridge and to be used as a reason for unnecessary infrastructure investment such as the proposed new CWWTP plant?

Green Belt. The relocated CWWTP would be on prime farmland in the Cambridge Green Belt. Designed to protect the historic setting of Cambridge in addition to preventing urban sprawl, the Cambridge Green Belt is the smallest of the fourteen Statutory Green Belts in the country. It has already been badly damaged by new developments to the north and north-east of the city.

Section 13 of the proposed, revised NPPF sets out very clearly the protections that should continue to be applied to designated Green Belts and the policies which should be met if any land is to be withdrawn from the Green Belt.

Paragraph 142 in the revised NPPF states clearly that Green Belt boundaries "*should only be altered where exceptional circumstances are fully evidenced and justified*", and "*Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing, commercial or other development through other means.*" It is clear that such exceptional circumstances do not apply to the CWWTP which has capacity and operational ability for 50 years and where housing need, as described above, can be met from existing designated sites within the Local Plan.

Moving the CWWTP from its existing urban site to high quality Green Belt farmland would not be in accordance with the revised NPPF. Furthermore, the proposed site has high landscape value and historical merit, being part of the planned Wicken Fen Vision.

The site cannot be considered 'Grey Belt' which is a term that seriously concerns CPRE because it will lead unscrupulous developers and landowners to let their land deteriorate in order that it can become 'Grey Belt'. CPRE recommends that all such land within Green Belts should be considered as land for returning to agricultural use, re-wilding or other environmental improvement, rather than targeted for development.

Flood Risk. Section 14 of the revised NPPF, titled "Meeting the challenge of climate change, flooding and coastal change", remains unchanged. CPRE were expecting this Section might have been strengthened. The climate crisis continues to worsen with major flooding around the world, including the most recent flooding in Spain, where it was reported that one month's rain fell in one day. The 2023/24 winter saw major flooding in the Great Ouse and Nene catchments and in the Cambridgeshire and Lincolnshire Fens. This Autumn, there has again been major flooding in both catchments.

As we have stated previously, the annual rate of sea-level rise is increasing in a straight line and, since 2014, the 30-year average has risen from 3mm/annum to 3.61mm/annum and the 5-year average has risen to 4.35 mm/annum, meaning an effective rate, allowing for 1mm/annum land shrinkage, of 5.35mm/annum.

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The proposed relocation site for the CWWTP lies between 6 and 8 meters above sea level, AOD. AOD is now considerably below current actual sea level.

Paragraph 160 of the revised NPPF states “ *New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change.*” It would appear that the proposed new site is as vulnerable, if not more vulnerable, as the current site.

Paragraph 166 of the revised NPPF states that strategic plans “*should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.*”

CPRE would draw your attention to the fact that at the Public Inquiry the Environment Agency stated that the new CWWTP would increase flood risk and that the new plant is likely to cause environmental detriment, overall.

Water Supply. It is also relevant to Paragraph 166, that the Environment Agency has formally objected to four major new housing developments in the Greater Cambridge area on the basis of insufficient water. The Agency has also written to Cambridge Water to inform them that when their abstraction licence is next renewed, it will be substantially reduced to prevent further damage to the chalk aquifer.

The local planning authority has ignored this advice in one case, by relying on promises from Anglian Water of a new reservoir to be built near Doddington, Fenland. It is most unlikely that this reservoir will ever be built because the location will become flooded and the proposed abstraction point on the Great Ouse near Bluntisham is tidal and will gradually become increasingly brackish as sea level rises.

The implication for the CWWTP, is that it will remain well within its 2050 operational capacity because it will eventually be realised that the housing numbers proposed are a pipe dream without sufficient water supply.

Furthermore, Paragraph 20 of the revised NPPF includes that “*Strategic policies should make sufficient provision for: b) infrastructure for water supply,*”

Relevance. CPRE considers that all of the points made above are relevant to the determination of the current Application. All relate to the revised NPPF but several are not new revisions but current policy.

Weight that a decision-maker should attach to the proposed revisions. CPRE considers that all of the points made above whether current policy or proposed revision of the NPPF carry considerable weight that a decision maker should take into account.

Conclusions

CPRE considers that the revisions to the NPPF highlight the environmental and financial irresponsibility of the proposal to relocate the CWWTP from its current site in urban Cambridge, to high quality, productive farmland in the Green Belt, in a location which will blight local communities and the Wicken Fen Vision, cause unnecessary greenhouse gas emissions from construction and cause increased accident risk on the over-crowded A14 trunk road.

The housing numbers contained in the current Local Plan already exceed the numbers required by the Standard Method and the new CWWTP is not required to service these numbers of homes.

The proposed building of additional housing and workspace on the vacated, contaminated, suburban site would in itself be contrary to the NPPF and its proposed revisions.

CPRE maintains all of the objections that it has raised at the Public Inquiry and in previous correspondence with the Planning Inspectorate. These are summarised below.

1. CPRE believe that the Cambridge CWWTP should remain on the existing site at Milton where there is room for a smaller, modernised facility, using new technology to be implemented when required and where the existing plant can be safely used until 2050. This is the least cost, least risk option.

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2. CPRE strongly objects to the location of the proposed site in Cambridge Green Belt and the resulting loss of best and most versatile farmland, harm to the environment and harm to existing communities.
3. CPRE strongly objects to the removal of further land from the Cambridge Green Belt for new roads to support the proposed site and the intrusion of general-purpose HGV, CWWTP tanker traffic and other commercial and car traffic into the surrounding Green Belt countryside.
4. CPRE is very concerned by the visual impact of the proposed new plant on the fenland landscape and the Wicken Fen Vision area in particular.
5. CPRE is very concerned that the tranquillity of the surrounding fenland will be unduly harmed by light pollution, noise, odour, dust and vibration caused by the construction and operation of a new CWWTP and the vehicles required to service it.
6. CPRE is concerned by the affordability of both the relocation and the decommissioning of Milton sewage works, that the £227m HIF awarded by Homes England is finite and that the choice of site has probably been decided solely on financial considerations. There is a clear risk to the completion of the project and to its resulting quality if the available funds are exceeded due to under-budgeting or, as now seems likely, due to the recent very substantial increases in the costs of construction labour and materials following BREXIT and the war in Ukraine.
7. Because the £227m is finite it is possible the viability of the proposed Cambridge North-eastern Fringe development, in which Anglian Water have a direct interest, may be compromised should further funding be required, particularly if developers are not prepared to bear any unbudgeted cost of remediation of the land, in which case the cost would fall on the tax-payer or council tax-payer.

The fact that in May 2024, the then Government breached its own £250m Funding Cap on this project by allowing Homes England to award it a further £50m of capital funding from the Homes Infrastructure Fund proves the points made in paragraphs 6 and 7 above. This project will prove to be an ongoing drain on scarce national resources by a company which is failing to deliver effective leakage control or pollution control by its existing facilities, except at the existing main Cambridge WWTP.

8. CPRE consider that there should be a more detailed appraisal of the effects of the proposed replacement CWWTP on the Waterbeach Zone and request that Anglian Water consult with Waterbeach Parish Council and conduct a public consultation. Residents of Waterbeach and other members of the public are currently unable to comment properly as there are limited details of those plans which will affect Waterbeach.
9. It is our conclusion that this is an unnecessary move, which will cause substantial loss of Green Belt land, considerable permanent disturbance to the surrounding Green Belt and increase the risk of further development in the Green Belt. Furthermore, its construction and the destruction and remediation of the existing plant will cause considerable and avoidable greenhouse gas emissions.
10. Please note that our submission is in respect of the proposed development. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts.

CPRE recommends that this application should be refused.

Yours faithfully,

Alan James BScTech, PhD, MIMMM, MBCS, CEnv, CITP
On behalf of CPRE Cambridgeshire and Peterborough