



Homes
England

The Housing and Regeneration Agency

The Rt Hon Steve Reed OBE MP
Secretary of State for Environment, Food and Rural Affairs

By email to: CambridgeWWTPR@planninginspectorate.gov.uk

13th November 2024

Dear Secretary of State,

**APPLICATION FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE PROPOSED
CAMBRIDGE WASTE WATER TREATMENT PLANT RELOCATION PROJECT**

I am writing to express Homes England support for this Application for an Order granting Development Consent as I believe it is central to realising the placemaking potential of Cambridge.

In your letter dated 16th October 2024 you invited representations on the content of the following documents:

- 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.'

Specifically, you requested that any representations given address the following:

- 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.

As Homes England (HE) is a Non-Departmental Public Body (NDPB) of the Ministry of Housing, Communities & Local Government (MHCLG), it is responsible for delivering MHCLG's strategic objectives and implementing policy, which is formulated by MHCLG. I am therefore focusing on some of the announcements and revisions that I think you may find relevant in your determination of the Application and responding to the questions you have posed.





Relevance of the proposed revisions to national planning policy to the determination of the Application

Given statements already issued by Government Ministers this application is well aligned with Government ambitions around housebuilding and use of the green belt. The Application involves the construction of a new waste water treatment plant on green belt land which would make the site of the existing facility available to form part of the development of a new low-carbon city district, known as North East Cambridge (NEC), that will deliver more than 8,000 new homes.

The Deputy Prime Minister and Secretary of State for Housing Communities and Local Government presented a written statement to the House of Commons entitled 'Building the Homes We Need' and published a letter to local authorities in England entitled 'Playing your part in building the homes we need' on 30th July 2024. Matters relevant to the Application include:

- 1) **Housing targets:** "a new standard method [the required approach for assessing housing needs and planning for homes] to ensure local plans are ambitious enough to support the Government's commitment to build 1.5 million new homes over the next five years" and "the new method increases targets across all regions relative to the existing one and significantly boosts expectations across our city regions – with targets in Mayoral Combined Authority areas on average growing by more than 30%. [outside London]."
- 2) **Growth supporting infrastructure:** "Building more homes is fundamental to unlocking economic growth, but we need to do so much more. That is why we are also proposing changes to make it easier to build growth-supporting infrastructure" and "support new, expanded or upgraded public service infrastructure."
- 3) **Strategic planning (cross-boundary):** "The Government was clear in the Manifesto that housing need in England cannot be met without planning for growth on a larger than local scale, and that it will be necessary to introduce effective new mechanisms for cross-boundary strategic planning" and "this will play a vital role in delivering sustainable growth and addressing key spatial issues – including meeting housing needs, delivering strategic infrastructure, building the economy, and improving climate resilience."
- 4) **Strategic planning (universal coverage of ambitious local plans):** "We will therefore take the steps necessary to enable universal coverage of strategic planning within this Parliament."
- 5) **Green Belt and Grey Belt:** "councils [are] required to review boundaries and release Green Belt land where necessary to meet unmet housing or commercial need" and "authorities to prioritise sustainable development on previously developed land and other low quality 'grey belt' sites."

The Government published a revised draft of the National Planning Policy Framework and launched a consultation entitled 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system' on 30th July 2024. The documents above take





forward the Government's statements on 'Building the Homes We Need' and show a clear policy direction towards supporting increased house building and the approach to the Green Belt. Matters relevant to the Application include:

- 1) **Presumption in favour of sustainable development:** "improve the operation of 'the presumption' in favour of sustainable development".
- 2) **Maintaining effective cooperation:** "Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience, are addressed."
- 3) **Public service infrastructure:** "Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development."
- 4) **Locational requirements of different sectors:** "Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for... the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience."
- 5) **Making effective use of land:** "Planning policies and decisions should... give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be regarded as acceptable in principle" and "that plans should promote an uplift in density in urban areas."
- 6) **Green Belt:** "identify grey belt land within the Green Belt, to be brought forward into the planning system through both plan and decision-making to meet development needs."

Weight that a decision-maker should attach to the proposed revisions

My view is that considerable weight should be given to these documents. Paragraph 6 of the National Planning Policy Framework recognises that '...statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements' and I would consider that letters from government ministers to decision-making bodies such as local authorities are material. The draft National Planning Policy Framework is material for planning decisions and weight can be attached to it from the day of publication and this will increase in the event that the draft, subject to the outcome of the recent consultation, becomes the final published version.

These documents are already shaping and influencing wider aspects of Government policy and delivery including:

- 1) **The Autumn Budget 2024:** re-stated the Government's Growth Mission as the central mission of the government and includes plans for improved infrastructure and housebuilding nationally across England and also locally in Cambridge. This will





unlock “future economic growth through £10 million of funding to enable the Cambridge Growth Company to develop an ambitious plan for the housing, transport, water and wider infrastructure Cambridge needs to realise its full potential and taking the next steps to deliver East West Rail.” Peter Freeman, the current Chair of Homes England, was appointed as Chair of the Cambridge Growth Company on 30th October 2024 by Matthew Pennycook MP, Minister of State for Housing and Planning. Increased funding has also been made available to the Greater Cambridge area to enhance the efficiency and effectiveness of planning services locally.

- 2) **Homes England’s Chair’s Letter:** The Minister of State (Housing Communities and Local Government) wrote to Peter Freeman, Chair of Homes England, on 30th September 2024. In this “Chair’s Letter”, the Minister confirmed two overarching objectives of Homes England, namely boosting growth through the delivery of new housing supply and place-based regeneration and place-making. He also set out immediate priorities including “the Agency to do everything in its power to accelerate development and increase delivery” and noted that the “Agency’s valuable experience has already been harnessed to establish and progress work in relation to Greater Cambridge and I believe there is merit in considering how the Cambridge model might serve as a template.”

In light of the above, I would like to take this opportunity to reiterate that Homes England remains fully committed to working in tandem with the project partners to deliver this vitally important project, not least through our £277m Housing Infrastructure Fund (HIF) investment. The project will not only allow the new waste water treatment plant to be delivered (along with all of its associated environmental and infrastructure resilience benefits) but also enable the wider development of life sciences and new homes in the last large scale brownfield regeneration site within the urban area of Cambridge. We are working closely with the project partners to ensure that delivery commences as soon as the appropriate approvals are forthcoming to realise what is a genuine opportunity, because of the area’s size, scale and location, to create truly transformational and exemplary placemaking for Cambridge.

Yours sincerely



Peter Denton

Chief Executive Officer

