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**From:** Mike Kovacs [REDACTED]  
**Sent:** 25 January 2025 14:28  
**To:** Cambridge Waste Water Treatment Plant Relocation  
**Subject:** Highlighting Importance of Embodied Carbon Considerations

[REDACTED]

Dear Planning Inspectorate team,

I am emailing about the Cambridge WWTPR project. I am a Cambridge resident, although I am not directly affected by the project. I am a practitioner in whole life carbon assessment in the built-environment, and I am aware of the project by way of interest from my professional perspective.

I have reviewed [Rev 6 of the project's Environmental Statement Chapter 10: Carbon, published April 2024](#).

I am most alarmed by the up-front carbon impact of the proposed developments. I refer to Figure 4.5 Net Cumulative Lifetime Emissions, which perhaps gives us the most optimistic view of the redevelopment proposal. In this figure, the status quo is shown not to have a significant upfront carbon impact, i.e. no construction or demolition emissions. By 2090, the total emissions from the existing site are projected to be a fraction of the emissions that will be produced in the short term (1-2 years) in any of the redevelopment plans.

Optimistically, the DCO design demonstrates the potential of the preferred option to avoid emissions from gas generated from other more intensive sources. If many assumptions are correct, the DCO design would have net emissions equivalent to the Baseline (continuing operation of the existing site) within ~12 years; and would be net negative in terms of carbon emissions after 15 years. However, it is the reliance on "many assumptions" that is of significant concern. I hope the optimism regarding the assumptions (which play out over many years) is correct. I also hope there might be a means to achieve appropriate redress, if the opportunities are not realised and the net emissions cannot be as beneficial as are being predicted today.

Ultimately, the comparison between the two options is incredibly challenging - even philosophical. It is a matter of whether or not to allow development to proceed, because it can, in the long-term, have net beneficial impacts; or to put off development, to avoid significant carbon emissions in the short term, which have accumulating effects on the planet and humanity's remaining carbon budget.

I am afraid the latest NPPF update does not currently deal with this matter at all; I look forward to the day it does, as it will give much clearer direction to all sorts of building projects across the country. It will enable the UK's built-environment developers to move forward with a consistent understanding of our priorities in terms of carbon emissions from the built-environment.

I wanted to raise awareness of this gap in how the NPPF deals with guidance around upfront and whole-life carbon emissions. It may be helpful for the Planning Inspectorate to consider the following recent publication that, to me, highlights the gap in thinking / prioritising whether or not to emit significant carbon today, to one-day achieve a net benefit; or to make due with what we have for as long as we can, to avoid significant immediate carbon emissions. [REDACTED]

That is all.

Thank you for your time.

Mike Kovacs