

Representation on the adopted NPPF addressing the extent to which the adopted national policies as regards to House Building and Green Belt are relevant to the determination of the Application:

NPPF Chapter 13 Protecting Green Belt Land pg 42-47 link: [Adopted NPPF-December-2024.](#)

Adopted NPPF Dec 2024	Comment	References
<p>Chapter 13 Green Belt:</p> <p>Para 153-4</p>	<p>The proposed development (PD) is by definition ‘inappropriate development’ and harmful to the Green Belt.</p> <p>The most recent independent Green Belt Study informing the Greater Cambridge Emerging Local Plan (2021) identified development of the land and or in the vicinity (OA2) would have <b>Very High Harm</b> to the Purposes of the Cambridge Green Belt <a href="#">GC Green Belt Study 2021</a></p> <p>The purposes identified as fulfilled relate to purposes a; b; c; d. as set out in the NPPF para 143. <a href="#">GC Green Belt Study 2021 Appendix A Newton-Outer Areas</a></p> <p>The PD does not fulfil any criteria identified in para 154 where exception applies.</p> <p>The case made by the Applicant of exceptional circumstances founded on circa 8,000 homes is deceptive and flawed. These homes are not all dependent on a relocation of the Cambridge Waste Water Treatment Plant (CWWTP) complexities abound the remaining and are likely to result in a significantly lower number of homes and further, alternatives are available.</p> <p>a) As identified by South Cambs District Council (SCDC) in the Local Impact Report (REP5-120 pg 22) circa 1400 of these homes lie outside the current odour contours of the existing works and are not dependent on the PD/ relocation for build out.</p> <p>b) The existing Waste Water Treatment Site has been identified as accommodating 3,700 of these homes (REP5-120). However, during the later stages of the DCO Examination the Applicant advised that in order to assist financing the PD some of the land understood to be otherwise intended for</p>	<p><a href="#">GC Green Belt Study 2021</a></p> <p><a href="#">GC Green Belt Study 2021 Appendix A Newton-Outer Areas (OA2)</a></p> <p>SCDC Local Impact report (LIR) REP5-120 pg 22</p>

	<p>homes has been contracted for commercial R&amp;D office development and early build out. The amount was specified as 87,100sq metres at a presentation at the Greater Cambridge Joint Development Committee (January 22<sup>nd</sup> 2025 1:44:11).</p> <p>This scale of R&amp;D development will inevitably impact on the number of homes that can be built on the existing site, at least in the high '00s. The outline plans are already at very high levels of density (unprecedented for Cambridge) and at the highest number of storeys permitted within the Proposed Submission Area Action Plan (NECAAP). The latter on account of impact on three Conservation Areas: River Cam/Stourbridge; Fen Ditton; Baits Bite Lock.</p> <p>c) Circa 1400 of the homes are identified for land parcels amongst multiple private ownership, including Crown Estate (REP5-120), the delivery of these homes are not guaranteed. As reported by Greater Cambridge Partnership (GCP) a number of land parcels including those identified for residential development are coming forward within the North East Cambridge (NEC) area, some with planning permissions. A number of these are of sufficient scale that a review of the NECAAP in the context of ...."evidence, vision and content" will be required <a href="#">GC Plan Making Time-Table Nov 2024 para 26</a> .</p> <p>The demand for commercial development across NEC remains strong, land owners/developers may not choose residential development and or the number of homes factored into the cumulative sum of 8,000.</p> <p>d) In the context of the need for delivery of homes and the realisation of the 8,000 put forward by the Applicant, only 3,900 have been identified by joint councils as deliverable within the emerging Plan period in the North East Cambridge Area to 2041 i.e. within the next 20 year period. Further, several hundred (circa 600) of the 3,900 are already in plan and not dependent on a relocation of the existing waste water treatment works or PD (REP5-120).</p> <p>e)There are unknowns influencing the timely build out of homes specific to the existing waste water treatment site. The Applicant proposes it will be responsible for dismantling and clearing the site. However, de-contamination and preparedness of the site fit for residential development will be dependent on developers all of which introduces unknowns, including financial risk impacting proposed build out numbers and time scales.</p>	<p><a href="#">GCP Joint Development Committee 22-01-2025</a></p> <p><a href="#">Greater Cambridge Plan-making Timetable 2024</a></p> <p>SCDC Local Impact report (LIR) REP5-120</p>
--	--	--

	<p>e) A Trip Budget limiting the number of vehicles travelling into the North East Cambridge Area from the A14 has been established and identified by GCP has a risk factor in the delivery of the North East Cambridge Area Action Plan (NECAAP) (<a href="#">Greater Cambridge First Proposals Policy S/NEC</a>) . The risks on the timely delivery of housing on a cleared site will be exacerbated by the number of large scale developments underway ahead of any build out of homes.</p> <p>f) In its submissions the Save Honey Hill Group has demonstrated there is sufficient capacity amongst existing major development sites and others planned to redistribute the circa 3200 homes identified in the emerging Local Plan for build out to 2041 and dependent on the PD without the need to identify new sites within the Green Belt above those already intended. Further, that the remaining balance to 8000 homes proposed for build out beyond the emerging Plan period i.e the longer term can be accommodated amongst other large scale development sites in plan or proposed. SHH04 REP1 -171 See 6.6</p> <p><b>In conclusion exceptional circumstances to outweigh harm to the Green Belt do not exist.</b></p>	<p><a href="#">Greater Cambridge First Proposals Policy S/NEC</a></p> <p>SHH04 REP1 -171 See 6.6</p>
<p>Para 155 a;b;c</p>	<p>The PD does not fulfil any criteria listed that would not regard it as inappropriate.</p> <p>a) The land in question is of high quality Green Belt and productive arable land.</p> <p>b) There is no demonstrable need for a relocation or new waste water treatment works away from the existing site.</p> <p>The central premise of AW’s application for public finance via Housing Infrastructure Funding (HIF) was that there was no requirement or need for the relocation ie there is sufficient capacity to meet the forecasted needs of the population the existing works serves.</p> <p>If increased capacity to accommodate the growing population of Cambridge was a ‘demonstrable unmet need’ AW would be required by law to fund the expansion of the existing works (I understand there is capacity to do so) and or a relocation.</p> <p>c) The PD does not meet the ‘Golden Rules’ see 156-157.</p>	

<p>156 b.c.</p>	<p>The para refers directly to major housing developments and is not therefore applicable to the PD. However should the Secretary of State consider it of consideration the comments are as follows:</p> <p>a) The PD, a relocation of the existing <u>W</u>aste Water Treatment Works into the Green Belt has not been included in the existing and or Emerging Greater Cambridge Local Plans and has not been open to member or public consultation through the Local Planning Process.</p> <p>b) As above (155 b) there is no evidence to support the existing waste water infrastructure /works requires necessary improvements. The existing works was upgraded in 2015, any increase in capacity or efficiency arising form a new treatment works would be a bi-product of the PD; neither requirement for increased capacity nor efficiency forms part of the Application.</p> <p>The Examination process clarified the PD is not national infrastructure.</p> <p>c)The green spaces proposed in the PD as mitigation for the impact on existing rights of way will be in the immediate vicinity of the PD inside odour contours, though classified as ‘negligible’ by the Applicant, are at a level where 50% of the population have been found to detect foul odours <a href="#">CWWTPR Stage-4-Final-Site-Selection-Preliminary-Odour-Study</a>. This is neither an improvement to existing accessible green spaces that would be diminished, nor of good quality.</p> <p>Further, the PD inclusive of the landscaping proposed, a critical component of mitigation, has been identified as having an adverse and significant effect into the longer term on the Eastern Fen Edge Local Character Area (LCA) REP6-029 Table 4.5</p>	<p><a href="#">CWWTPR Stage-4-Final-Site-Selection-Preliminary-Odour-Study</a></p> <p>REP6-029 Table 4.5</p>
-----------------	---	--

<p>NPPF Chapter 5 Delivering a sufficient supply of homes Para 61</p>	<p>Housing Land Supply in Greater Cambridge remains strong and ahead of Local Plan targets for the plan period to 2030. The latest Housing Delivery Test results, December 2024, show Cambridge at 114% and South Cambridgeshire at 153%. <a href="#">GCP Housing Delivery Test Dec 2024</a></p>	<p><a href="#">GCP Housing Delivery Test Dec 2024</a></p>
<p>62</p>	<p>The GCP in preparation for the emerging Local Plan (2020-2041) have to-date used a method over and above the standard method. This has been based on employment growth and a 1:1 housing to employment ratio above the standard method.</p> <p>The new standard method introduced in the adopted NPPF does not exceed this. It has been reported the new Government delivery targets for Greater Cambridgeshire are 2,309 , where the delivery targets of the emerging Local Plan are 2,463 <a href="#">Cambridge Independent 12 Dec 2024.</a></p> <p>Over a 20 year period the new standard method would require 46,180 homes, where the emerging Local Plan is targeting 51,700 homes. The emerging Local Plan is not dependent on the PD to fulfil its housing requirement.</p> <p>In the emerging Local Plan period to 2041, 3,700 homes have been allocated for build out at North East Cambridge. Around 600 of these are not dependent on the PD ie a relocation of the Waste Water Treatment Works leaving a balance of circa 3000 homes.</p> <p>The Save Honey Hill Group has demonstrated that housing numbers as a requirement of the emerging Local Plan can be met without the PD either as a reduced requirement and or redistribution amongst existing and other new development sites already intended SHH 04 REP1-171 6.6.</p> <p><b>Concluding exceptional circumstances do not exist.</b></p>	<p><a href="#">Cambridge Independent 12 Dec 2024.</a></p> <p>SHH 04 REP1-171 6.6</p>