

## Save Honey Hill Group

Steve Reed OBE MP  
Secretary of State.  
Water Infrastructure Planning & Delivery Unit  
Department for Environment, Food and Rural Affairs

**By e-mail only**

03 February 2025

Dear Sir

**Application by Anglian Water Services Limited for an Order granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation Project (DCO/CWWTPR24): Submission on the Adopted NPPF**

This is a response from the Save Honey Hill Group (IP 20041423) to your Consultation 4 letter dated 20 January 2025 inviting representations from Interested Parties (IPs) 'on the adopted NPPF addressing in particular the extent to which the adopted national policies as regards to house building and Green Belt are relevant to the determination of the Application.'

SHH and other parties made representations on Consultation 3 on the draft National Planning Policy Framework (NPPF) in November 2024. This response to Consultation 4:

- (i) confirms the weight which must be given to the NPPF, as adopted in December 2024, by the Secretary of State in his decision;
- (ii) clarifies the ways in which the application is entirely contrary to all of the relevant policies in the adopted NPPF;
- (iii) responds to representations by other parties on the draft NPPF;
- (iv) notes recent changes in circumstances directly relevant to the Secretary of State's decision on the application in Sections 4 and 5 and
- (v) sets out SHH's conclusions on the relevant adopted national and local planning policies.

### **1. Weight to be Given in the Decision to the Adopted NPPF and Planning Practice Guidance**

The NPPF, as now adopted, and the Planning Practice Guidance, together with the adopted local plans, are the formal statements of policy that the Secretary of State must apply in reaching a decision on this DCO application. Public statements and letters from ministers that introduced changes in the consultation draft NPPF are no longer relevant, where draft changes were withdrawn or amended as a result of consultation. Policies in the Framework must be considered as a whole, when reaching a decision on this DCO application.

### **2. Commentary on the Adopted NPPF**

SHH set out a detailed commentary on the draft NPPF at Consultation 3. Much of that response remains relevant and is not repeated here.

### *Sustainable development, para 11*

A core principle in the NPPF is ‘the presumption in favour of sustainable development’ in para 11. This paragraph is, in substance, unchanged from that in the December 2023 NPPF, as already considered by the Examining Authority. There are indeed ‘strong reasons for refusing the development proposed’ because it is entirely contrary to the purposes and function of Green Belt, as set out in the adopted NPPF and local plans. No ‘very special circumstances’ exist to justify the proposed development as required by Green Belt policy.

It is also the case that, in the words of Para 11(d)(ii), the ‘adverse impacts [of the Proposed Development] .... would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.’ It is important to note that this paragraph has been strengthened in the adopted NPPF, drawing attention to ‘key policies directing development to sustainable locations, making effective use of land [and] securing well-designed places’. This application meets none of those key policy requirements.

### *Effective Strategic Planning and Cooperation in Local Planning, paras 24 to 28*

The adopted NPPF has strengthened the requirement for neighbouring local planning authorities and infrastructure providers to work together to create effective strategic plans and deal with cross-border housing and infrastructure provision.

Cambridge City Council and South Cambridgeshire District Council are already doing this, assisted by the Cambridge Growth Company and CAPCA<sup>1</sup>. This will entail closer working with adjoining local authorities, in particular, East Cambridgeshire, Huntingdonshire, West Suffolk and North Hertfordshire, which are all part of the Cambridge housing market and travel-to-work areas. This strategic working will help create improved public transport across the sub-region and allow a small proportion of Cambridge’s housing needs to be met in easily accessible, but more affordable, housing locations beyond South Cambridgeshire.

### *Delivering Sufficient Housing, Mandatory Housing Requirements and Affordable Housing, paras 62 to 66, 69 to 71 and 78*

SHH made detailed representations at Consultation 3 on the house-building and local planning changes proposed in the draft NPPF, including presenting an assessment of the housing needs that will need to be met in the emerging Greater Cambridge Local Plan (GCLP). Most of these changes have been incorporated in Section 5 of the adopted NPPF and amplified in Planning Practice Guidance, which was updated in December 2024.

Local planning authorities must prepare local plans which will deliver sufficient housing to meet local housing needs as assessed ‘using the standard method in national planning guidance’ as required in paras 61 and 62. Other methods of assessing local housing needs including demographic assessments are no longer permitted by the NPPF. All elements of housing need must be taken into account including, explicitly, the need for social housing, as reiterated in para 63, and for all types of affordable housing, as set out in paras 64 to 66. New paras 67 and 68 of the adopted NPPF are not relevant to the determination of this application.

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<sup>1</sup> Cambridge and Peterborough Combined [Mayoral] Authority

In the Planning Practice Guidance, the ‘standard method’ was amended to increase the affordability uplift element of the formula. For clarity, we describe this method as the Adopted Standard Method (ASM).

Cambridge City Council and South Cambridgeshire District Council, in the Greater Cambridge Local Plan (GCLP), must revise their previous housing need assessments, replacing those included in the GCLP First Proposals, in 2021, and the Development Strategy Update (DSU), January 2023. Both relied on housing need assessments, based on demographic assessment and unrealistically high employment-led projections, which are methods no longer allowed under the adopted NPPF. Table 1 compares the results of the need as calculated by the Adopted Standard Method with those other assessments.

Table 1 Housing Need Assessments for Greater Cambridge for the Local Plan Period to 2041: Additional Dwellings Per Annum Required (without adjustments)

Local Authority	Previous Standard Method (see note 1)	NPPF Adopted Standard Method 2024 (see note 2)	GCLP First Proposals 2021	GCLP Development Strategy Update 2023
Cambridge City	687	<b>1123</b>	n/a	n/a
South Cambridgeshire	1039	<b>1180</b>	n/a	n/a
Greater Cambridge LP Area	1726	<b>2303</b>	2111	2463

Note 1: As advised in previous NPPF Note 2: Number of additions to stock required from the GCLP base date, taken to be April 2024

The adopted NPPF requires the emerging GCLP to use the Adopted Standard Method (2,303 net additions to housing stock per annum from April 2024).

The GCLP First Proposals identified sites for **48,840** houses over the plan period, using the then current NPPF rule that a 10% buffer had to be added to the assessed need. The adopted NPPF in para 78(a) will allow the GCLP to apply a reduced buffer of 5%. Taking account of the housing built since 2020 means that the emerging GCLP will need to identify sites for **48,425** houses for the comparable period 2020 to 2041<sup>2</sup>, 415 fewer than in the First Proposals.

SHH gave detailed evidence to the DCO Examination to demonstrate that the housing need of Greater Cambridge as assessed in the GCLP First Proposals **could be met without the need to relocate the existing WWTP or redevelop the core parts of the existing site**. The analysis above reduces the overall housing requirement across the local plan area, further supporting that evidence.

If the WWTP relocation is not approved, the potential for housing to be delivered within the North East Cambridge Area Action Plan (NECAAP) area by 2041 may have to be reduced from 3,900 dwellings to an estimated 1,350<sup>3</sup>. Thus, at most, the remaining balance of 2,135 houses (2,550-415) may need to be brought forward into the local plan from the allocations and permissions already granted on major sites around Cambridge<sup>4</sup>, an average of 125 per annum. We believe that the planning authorities

<sup>2</sup> A small adjustment has been made to allow for housing stock additions that are not new building, based on data for 2020 to 2024 from ONS Live Housing Table 123.

<sup>3</sup> This is the minimum figure that could be built without the requirement of relocating the CWWT, as presented at the DCO Examination by the local authorities, adjusted to remove the Merlin Place site, where employment development has now commenced. SHH believes that more housing than this could be built alongside an improved WWTP in situ.

<sup>4</sup> Intended in the First Proposals to be developed post 2041.

could also disperse a small proportion of the housing need to places outside South Cambridgeshire as noted in the response on paras 24 to 28, above.

This analysis further reinforces the evidence given by SHH at the DCO Examination that there are ample sites with planning permission or allocated in adopted local plans to sustain a new housebuilding rate at or above that set by the Adopted Standard Method, without any need to relocate the CWWTP or redevelop the core parts of the existing site. Housebuilding rates in Greater Cambridge remain buoyant, despite the very high local affordability ratios, persistent high mortgage interest rates and the disruption to housebuilding that resulted from Covid.

Contrary to the views of the Applicant and the local authorities, the CWWTP relocation has no local planning justification based on a pressing need for the existing site to be redeveloped for housing.

*Supporting Economic Development, para 87*

An amendment to paragraph 87 in the adopted NPPF states that ‘planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes: ... (c) making provision for the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience’. Both the Applicant and Homes England drew attention to this in their responses to Consultation 3.

However, this DCO application is for the relocation of fully functioning infrastructure onto Green Belt merely to facilitate housing development on land in the ownership of the Applicant. The amendment to the adopted NPPF is therefore not directly relevant and the Secretary of State should give no weight to it.

*Effective Use of Land, para 125(c)*

National planning policy over many years has required ‘substantial weight to [be given to] the value of using suitable brownfield land’ for all forms of development. This remains the case in the adopted NPPF, where para 125(c) reiterates that, adding the words ‘proposals for which should be approved unless substantial harm would be caused’. This is of no direct relevance to the decision on the DCO application, which intends the unnecessary development on valuable agricultural Green Belt, not ‘brownfield’ land.

*Achieving Well-designed Places, para 131*

Para 131 makes it clear that ‘the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve’. The Proposed Development is a poor design which does not deliver high environmental standards. It will have severe adverse impacts on the visual and landscape character of Green Belt and will only meet increased demand for a period of less than ten years after opening.

*Protecting Green Belt, paras 142 to 148, 153 to 155 and Glossary*

Following consultation, the wording of changes in the draft NPPF Section 13, Protecting Green Belt, has been modified in the adopted NPPF. The policies must be interpreted giving full weight to the ‘fundamental aim’, ‘characteristics’ and ‘purposes’ for the protection of land within adopted Green Belt boundaries, which are those in paras 142 and 143. These were not altered in either the draft or adopted NPPF and are the same as those in the 2012 NPPF (and in similar form going back to PPG2 in 1992 and beyond as far back as the seminal Circular 42/55). The concept and definition of ‘grey belt’ introduced into the adopted NPPF must be applied in the light of those principles.

The NPPF is, in any case, a planning framework, that is guidance not legislation. Care must be taken not to apply rigid principles of statutory interpretation. The adopted 2018 Local Plans<sup>5</sup> remain in force and contain a long-standing and well-tested interpretation<sup>6</sup> of national Green Belt policy which is applied to the unique Cambridge Green Belt. This includes three carefully drafted ‘purposes’, which are an interpretation of the five ‘purposes’ in the NPPF. These are used in both plan-making and decision-making in relation to land in the Cambridge Green Belt.

The Applicant, the local planning authorities and SHH all used the Land Use Consultants Greater Cambridge Green Belt Study 2021 (and predecessors) as the basis for evidence on the impacts of the Proposed Development on the Green Belt. This was the evidence considered by and accepted by the Examining Authority.

SHH gave detailed evidence to the Examination, in particular, in Sections 7.0 to 7.7 of the Relevant Representation [RR-035] and Sections 7.0 to 7.7 of the Written Representations SHH04 [REP1-171] that the ‘overall harm [from the Proposed Development] to an important part of the Green Belt will be substantial and should be rated as very high’. These impacts are significant and in places cause substantial losses to both the spatial and visual openness of the Green Belt extending over some 400ha of open Green Belt.

The changes proposed in the adopted NPPF are intended to encourage the orderly release of previously developed or other land defined as ‘grey belt’ within Green Belt boundaries, to meet identified housing and other development needs. This is principally intended to be undertaken through the strategic review and release of Green Belt under ‘exceptional circumstances’, as set out in paras 145 to 148. Para 148 sets out a hierarchy of types of land to be considered in those reviews: ‘Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider ‘grey belt’ which is not previously developed, and then other Green Belt locations. The need to promote sustainable patterns of development should determine whether a site’s location is appropriate.’ This application is not being promoted through a strategic review of Green Belt, therefore paras 145-148 are not directly relevant to the decision on this application.

The adopted NPPF in the Glossary sets out a revision to the definition of ‘grey belt’ land first included in the draft NPPF: ‘For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.’ In our view, the wording must be read as concluding ‘considered separately or cumulatively’. It is otherwise at odds with the intent of paras 142 and 143.

The evidence given by SHH to the Examination remains relevant to determining that the application site cannot be considered as ‘grey belt’ land. All of the application site, some 94ha in extent, is high quality productive agricultural land. As noted above, significant impacts on the visual openness of the identified Green Belt extend across some 400ha of land which is most of the Green Belt gap separating the settlements of Horningsea, Milton and Fen Ditton, the last two of these being effectively contiguous with the built-up area of Cambridge.

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<sup>5</sup> South Cambridgeshire Local Plan 2018 and Cambridge City Local Plan 2018.

<sup>6</sup> Which draws on a sequence of expert Green Belt studies, most recently those by LDA Design and Land Use Consultants for the local authorities in 2015 and 2021 respectively. The former study was examined in depth by an Inspector before adoption of the 2018 Local Plans.

Our conclusions in respect of the definition of this site relate to each of the NPPF purposes, drawing on the SHH evidence on Green Belt harm, which uses the Cambridge Green Belt Purposes. The relationship between the two is set out in Table 2.

Table 2 Relationship between Cambridge Green Belt Purposes and Adopted and Draft NPPF Purposes

Cambridge Green Belt Purpose	NPPF Purpose (includes alphabetical references as in December 2024 NPPF)	Comment
1. Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre.	1. (a) To check the unrestricted sprawl of large built-up areas	Cambridge Purpose 1 deals with the compact nature of the city and as such is directly related to the issue of urban sprawl, meaning that this purpose captures the essence of NPPF 1 (a).
2. Maintain and enhance the quality of its setting.	2. (c) To assist in the safeguarding of the countryside from encroachment. 3.. (d) To preserve the setting and special character of historic towns.	Cambridge Purpose 2 is clearly related to NPPF Purpose 4(d), as noted above, but is also closely related to NPPF 3 (c), owing to the strong rural character of Cambridge's setting. Whilst both NPPF Purpose 4 (d) and 3 (c) are covered under Cambridge Purpose 2, NPPF Purpose 4 (d) is given more weight. This allows more meaningful variations in contribution and harm to be drawn out in the specific context of Cambridge.
3. Prevent communities in the environs of Cambridge from merging into one another and with the city.	4. (b) To prevent neighbouring towns merging into one another.	Cambridge Purpose 3 is closely related to NPPF Purpose 2 (b). However, the focus here is not on gaps between 'towns' specifically, but on the gaps between Cambridge and the surrounding necklace villages and on the gaps between individual villages – both those within the inner necklace and those more distant.

Source: LUC Greater Cambridge Green Belt Study, 2021, Adopted Local Plans and Adopted NPPF

NPPF Purpose (a) is 'to check the unrestricted sprawl of large built-up areas'. The prevention of 'urban sprawl by keeping land permanently open' remains the fundamental objective of Green Belt as stated in para 142. The concept of 'urban sprawl' is difficult to apply to a single site, since it is normally applied to the results of numerous unplanned, uncoordinated developments carried out to different timetables by separate developers. It was coined to describe development that was occurring in the inter-war period especially in the countryside around London.

The first Green Belt was introduced by the Green Belt (London and Home Counties) Act 1938 with the express intention of controlling unrestricted sprawl around London, in particular to stop uncoordinated ribbon development along roads leading into London and prevent nearby towns merging with the conurbation. It pre-dated the modern planning system introduced by the Town & Country Planning Act 1947, which introduced coherent land use plans and gave local planning authorities the powers to designate Green Belts around other large built-up areas.

The Cambridge Green Belt originated from the Holford Report in 1950 and has been refined in successive statutory plans since then. It is unique among Green Belts. Cambridge is a free-standing city

with an internationally important historic core, but is far smaller than the other metropolitan areas with Green Belts. The designated Green Belt is only some 3 to 5 miles wide, a narrow girdle of generally flat and open land around the city. There are villages covered by or inset within the Green Belt, many of historic importance. Both Fen Ditton and Horningsea have important conservation areas and listed buildings.

This application would, if permitted, be a contributor to what the NPPF calls ‘unrestricted sprawl’ around Cambridge. The siting of the WWTP has never been endorsed by the local planning authority, nor does it appear in the adopted or emerging local plans. The application is unplanned and comprises a large industrial complex of some 34ha and involving permanent land take of 94ha. We have submitted that the permanent visual intrusion of the proposed plant across a series of defined impact zones extending from it would have significant impact on the openness of the Green Belt (SHH RR-035) and is ‘unrestricted sprawl’. The Applicant selected the site, when other options, including retention of the WWTP on the existing brownfield site or sites beyond Green Belt, were never robustly considered. The site is in the middle of an important area of high quality agricultural Green Belt<sup>7</sup> which magnifies the consequent harm to the ‘openness’ of the site and its wider visual impact zones. This site must remain undeveloped, and it is land that ‘strongly contributes’ to ‘check[ing] the unrestricted sprawl’ of Cambridge, purpose (a) as set out in the NPPF.

NPPF Purpose (b) is ‘to prevent neighbouring towns merging into one another’. This relates to Purpose 3 as set out in the adopted South Cambridgeshire Local Plan, which is to ‘prevent communities in the environs of Cambridge from merging with one another and with the city’. This is the accepted interpretation of Purpose (b) in the NPPF in the Cambridge context. Previous Green Belt studies have identified the role of the land area within which the Proposed Development sits<sup>8</sup> in maintaining separation of the villages as making at least a moderate and ‘generally higher’ contribution to Cambridge Green Belt Purpose 3. SHH’s evidence to the Examination concluded that development on the scale proposed would cause ‘very high harm’ to ‘openness’ and the purposes of Green Belt, impacting significantly on the physical separation of the historic villages surrounding the proposed site and the open agricultural rural land between them. Therefore, the site should be taken as ‘strongly contributing to purpose... (b)’ as set out in the NPPF.

NPPF Purpose (d) is ‘to preserve the setting and special character of historic towns’. This relates to Purpose 2 in the adopted local plan, which is to ‘maintain and enhance the quality of its setting’, where ‘its’ refers to the entire setting of Cambridge, including the historic villages within the Green Belt. ‘Quality of setting’ is defined according to a list of characteristics. Previous studies have identified that the land area immediately to the west of the Proposed Development incorporates key approaches to Cambridge and makes ‘a relatively strong contribution’ to Cambridge Green Belt Purpose 2<sup>9</sup>. Using a robust methodology (derived from the 2021 and previous Green Belt studies), SHH provided extensive evidence to the Examination in REP1-171, demonstrating the strong contribution the land area makes to the defined characteristics of the setting of Cambridge and the significant harm the Proposed Development would have on the Green Belt Purpose 2.

In combination with the impact on the contribution of Cambridge Green Belt purposes of adjacent Green Belt, the GC Cambridge Green Belt Study (2021) concluded that development in the land area associated with the Proposed Development would cause ‘very high harm’ to the purposes of the

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<sup>7</sup> In order to allow an unnecessary odour etc safeguarding zone of 400m from residential properties.

<sup>8</sup>LUC GC Green Belt Study 2021 Appendix A. Newton-Outer Areas (OA2)

<sup>9</sup> GC Green Belt Study 2021

Cambridge Green Belt. Considering the harm to openness and Purpose 2 of the Cambridge Green Belt, together, the site should be taken as 'strongly contributing to purpose... (d)' in the NPPF.

The wording of the Glossary notes that if a site makes a 'strong contribution' to **any** of the purposes listed, it is not 'grey belt'. This site is not 'grey belt', since it contributes strongly to all three of the purposes set out in the Glossary. To define it as 'grey belt' was not the intention of the adopted NPPF and would be entirely at odds with the fundamental objectives of Green Belt protection, recently restated by Ministers.

Paras 153 to 155 are therefore relevant to this application. The site is not 'grey belt' so footnote 55 to para 153 does not apply. The application remains 'inappropriate development' as agreed by the Applicant, the local authorities and SHH at the Examination. As set out in para 153, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'

All forms of development in Green Belt are 'inappropriate development' unless they meet the exceptions in either para 154 or 155.

None of the long-standing list of exceptions in para 154 apply to the Proposed Development.

The application is for 'other development' to which para 155 and footnote 56, which has been added to the NPPF, applies. The three tests in para 155(a), (b) and (c) **must all** be met for a development not to be 'inappropriate'.

The site is not 'grey belt' and, in any case, the Proposed Development site falls in an especially valuable segment of the Cambridge Green Belt and this development would 'fundamentally undermine the purposes (taken together) of the remaining Cambridge Green Belt'. If this damaging application is approved, it will be a precedent for numerous applications for housing, commercial and other development all across the Cambridge Green Belt. It fails test (a).

There is also no 'demonstrable unmet need for the type of development proposed'. This has always been accepted by the Applicant since it is merely a replacement for a fully functioning WWTP on its existing site within the urban area. It fails test (b).

The application site is not in a 'sustainable location' as required by test (c), although SHH accepts that the Applicant has proposed measures to mitigate the transport impacts.

Para 155(d) is clearly only relevant to housing applications.

The application remains 'inappropriate development'. The site for the relocated WWTP is on high value Green Belt separating Horningsea and the other villages from the Cambridge built-up area. It is not 'grey belt' and, as set out extensively in SHH evidence to the Examination, the relocation remains 'inappropriate development' that would cause substantial and irreversible 'very high harm' to the 'openness' and 'purposes' of the Cambridge Green Belt. It does not comply with the Green Belt policies in the adopted NPPF, nor with the relevant policies in the adopted local plan.

SHH clearly established in evidence to the Examination that no 'very special circumstances' exist that might allow the development and this remains the case. The application should be refused on Green Belt grounds alone.



*Loss of Valuable Agricultural Land, para 187(b)*

The Proposed Development will result in the unnecessary loss of 90 hectares of ‘best and most versatile agricultural land’ which is economically valuable and helps maintain the UK’s food security. This is contrary to para 187(b) and amended footnote 65 of the adopted NPPF.

*Harm to Designated Heritage Assets, para 215*

This section of the NPPF remains unaltered. SHH’s evidence to the Examination, supported by South Cambridgeshire District Council, confirmed that there will be permanent harm to the setting of several designated heritage assets, in particular, the Grade II\* Biggin Abbey. This permanent harm is at the higher end of ‘less than substantial’, which must be given considerable weight by the Secretary of State in reaching a decision, to accord with para 215 of the adopted NPPF.

### **3. Representations by Other Parties on the Draft NPPF**

SHH only wishes to comment on representations made by other parties on the draft NPPF, where these require correction.

*The Applicant*

Pages 4 and 5. Rejection of the DCO application will not, of itself, significantly delay the progress of the emerging GCLP, which, in any case, needs to be brought up to date to take account of national policy and other changes since the GCLP First Proposals were drafted in 2020. As set out in Section 2 above, housing needs in Cambridge can be met without relocating the WWTP, from the permissions and housing allocations already included in adopted local plans. The WWTP should be retained in situ, releasing part of the site it occupies and other land in North East Cambridge (NEC) for both housing and business development and by making entirely feasible changes to the rates at which other major sites, already allocated for housing, are delivered.

These are not, as the Applicant claims, ‘a substantial revision to the spatial strategy’ and need not involve ‘consideration of other less sustainable strategic locations including the Edge of Cambridge in the Green Belt’ as asserted by both the Applicant and SCDC.

Page 5. The changes to Green Belt policy, as now clarified in the adopted NPPF, are of no relevance to this DCO application, since they are directed at promoting redevelopment of so-called ‘grey belt’ land in sustainable locations. The DCO application proposes the loss of 90 hectares of high quality agricultural Green Belt (and adverse visual impact on a far larger area). None of the site is ‘grey belt’.

Page 6. The Applicant continues to misrepresent the treatment capacity of the relocated WWTP as set out in the application. As proposed, the Phase 2 capacity is, if housing development continues as intended in the adopted and emerging local plans, likely to be fully taken up as early as 2036. The Applicant has never shown that the restricted footprint of the proposed WWTP has sufficient space for further expansion to accommodate demand ‘well into the 2080s’ and certainly not ‘into the next century’.

Pages 8 and 9. The Applicant’s assertion in the Planning Statement, repeated here, that the Proposed Development would not fundamentally undermine the continued function of Green Belt is incorrect, as set out in SHH evidence to the Examination. None of the recent changes to the NPPF, considered as a whole, support the Applicant’s claim that ‘very special circumstances exist to justify the

Proposed Development in the Cambridge Green Belt.’

*South Cambridgeshire District and Cambridge City Councils*

The Councils’ view, in para 3, that the draft NPPF ‘introduces a presumption in favour of new infrastructure where it serves national interests’ is irrelevant. The relocation of the WWTP is not necessary to support the continued housing and employment growth of Cambridge, so there can be no ‘presumption’ that the application should be approved. This is not an application for an essential Nationally Significant Infrastructure Project.

The adopted NPPF, in paras 24 to 28, does require local plans and other measures to co-ordinate provision of infrastructure and meet housing needs across local authority boundaries. This will be secured by co-operation during preparation of strategic plans for the wider Greater Cambridge. The Cambridge Growth Company will be able to assist this. Its purpose is to promote delivery of essential infrastructure, particularly water supply and transport, and not to usurp the role of the local authorities in determining a spatial development strategy.

SHH gave compelling evidence to the Examination in REP1-171 that the existing WWTP could and should be retained and improved on a reduced site. The statement in para 8 of the local authority letter that the ‘potential for redevelopment [of surrounding land] has effectively been sterilised’ is incorrect. The local authorities should have carried through their commitment in the adopted Local Plans in 2018 to undertake robust feasibility studies that considered retaining the works on site. This would have enabled early development of underused land through a North East Cambridge Area Action Plan (NECAAP). Instead, Anglian Water has been allowed to cause years of further delay by pursuing an uncoordinated and unnecessarily expensive proposal to relocate the WWTP onto Green Belt.

*Homes England*

Homes England drew attention to references to promoting the growth of Cambridge in the Autumn Budget 2024 and in the letter appointing the chair of the Cambridge Growth Company. These ministerial statements are of no relevance to the decision on this application, which must be based on the adopted NPPF.

**4. The North East Cambridge Plan and the Proposed Redevelopment of the Existing WWTP Site**

The emerging North East Cambridge Area Action Plan (NECAAP) will need revision before it can be submitted as a Regulation 19 Local Plan, whether or not the DCO application is approved.

It needs amending to take account of the large amount of R & D and laboratory development<sup>10</sup> recently permitted or proposed by private landowners, including those by Brookgate Land, Merlin Place and the St John’s Innovation Park, as well as that now proposed by the Applicant to help fund the WWTP relocation. These were all set out in evidence from SHH during or since the DCO Examination. See SHH71 [AS-207] and SHH letter to Secretary of State, November 2024. The Brookgate development was approved in April 2024 and the Merlin Place and St John’s Innovation Park schemes are already under construction. Other proposals within the NECAAP area, including redevelopment of the existing Cambridge Business Park, are well advanced, but no floorspaces have yet been revealed.

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<sup>10</sup> These reflect developers’ responses to market demand, and all can go ahead successfully without relocation of the WWTP

As originally conceived in the draft NECAAP, the redevelopment of the 'core site', the existing WWTP site and adjacent land owned by Cambridge City Council, was intended to provide 5,600 dwellings with around 23,500 sq m of local retail and employment floorspace on an overall 47ha site. The Applicant's need for 'early commercial development' to meet the much increased costs of relocation, last reported as over £400 million, requires an additional 92,000 sq m of office and laboratory space<sup>11</sup>, removing around 5 hectares from the 'core site' redevelopment.

These changes undermine the original vision in NECAAP for North East Cambridge to be a mixed use community, with around 15,000 new jobs balanced by 13,500 new resident workers within walking distance. The employment floorspace proposed will provide for at least 25,000 new high technology jobs well served by Cambridge North station, but will reduce the potential for housing redevelopment on the 'core site'.

The changes will be practically difficult, if not impossible to resolve in a revised NECAAP:

- (i) the overall development of NEC is subject to a strict peak hour road 'trip budget', because of limitations on the primary road network including the Milton interchange on the A14. This already imposed tight limits on car use by any additional residents of the NECAAP area. The employment floorspace now permitted and proposed is likely to use up the whole of that trip budget, effectively making housing development, with even the lowest levels of car use, impracticable.
- (ii) Only around 42ha of land will be left for 5,600 dwellings, roads, local services, schools and open space at an extremely high gross density of 133 dwellings per hectare, as against the already high 120 dwellings per hectare anticipated in the draft NECAAP. 90% of the housing will have to be smaller apartments in medium or high-rise blocks, contrary to the maximum heights specified in the draft NECAAP.
- (iii) The developers of the 'core site' are only intending that 40% of these will be affordable housing and a further 25% open market 'build to let' housing, with no commitment to any social housing<sup>12</sup>. The result will not be a well-planned mixed neighbourhood, where a full range of housing needs, including for the elderly and larger families, are met, as required by paras 63 and 71 of the adopted NPPF.

The conclusion that should be drawn is that there is no adopted local plan or settled local plan proposals that would support the housing redevelopment of the existing WWTP site and there are unresolved constraints on both the amount and types of housing that would be possible if the relocation were to be permitted.

## **5. Public Expenditure and Value for Money of the HIF Grant**

Following the Autumn Budget 2024 and market reaction to it, the Government has found it necessary to seek further reductions in spending by Departments and non-departmental public bodies. These reviews should be focussed on projects and activities which do not achieve value for money.

Throughout the DCO Examination, SHH challenged the original £227 million Housing Infrastructure Fund (HIF) grant as being insufficient for the relocation and substantially greater than the cost of upgrading the existing works to allow adjoining housing development. The Applicant conceded the first point just before the close of the Examination, increasing the overall budget by £142 million, with

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<sup>11</sup> See Hartree EIA Scoping Opinion Request, July 2024, application 24/02432.

<sup>12</sup> See briefing from the architects of the 'core site' Hartree redevelopment to the Joint Development Control Committee on 22 January 2025. [<https://democracy.cambridge.gov.uk/ieListDocuments.aspx?CId=497&MIId=4518&Ver=4> Section 6]

£50 million to be provided by Homes England and a further £92 million from early commercial development of part of the 'core site' owned by Anglian Water. This latter sum will in effect be taken from land value receipts, sharply reducing the overall surplus from the development.

Homes England has not confirmed that spending £277 million of public money on an unnecessary relocation of the WWTP represents 'value for money'. The private sector is very keen to invest in laboratory and other employment floorspace in Cambridge, without needing any public funding. The HIF grant is being used only to facilitate the delivery of 40% affordable housing, up to 2,240 so-called affordable homes at 80% of market rent or similar. These will be unaffordable by many people fulfilling essential jobs in the Cambridge economy. The normal requirement for affordable housing on all sites in Greater Cambridge in the emerging GCLP can be funded by profits from the open market element of these schemes.

Homes England is, therefore, intending to spend £124,000 for every affordable housing unit provided by the 'core site' redevelopment. This is way in excess of any grant aid that is normally made through the Affordable Housing Programme to enable Social Housing at 50% market rents to be built by Councils or Registered Providers.

The increased HIF grant cannot deliver 'value for money' and the unspent grant should be recovered for other, more essential public spending projects. The Secretary of State should refuse this application, and the Deputy Prime Minister should instruct Homes England to cancel the HIF agreement.

## **6. Conclusions**

The Secretary of State must determine this application in accordance with the adopted NPPF, taken as a whole, and the adopted local plans.

In Section 2, we have set out all the relevant policies on housing and infrastructure delivery in the adopted NPPF as they relate to this application. The adopted 'standard method' for housing need assessment is now mandatory and will require fewer houses to be delivered over the local plan period to 2041 than were proposed in the GCLP First Proposals, in 2021, as considered at the DCO Examination. Our analysis confirms the evidence given by SHH that the housing and economic development needs of Cambridge can be fully met in the GCLP or neighbouring areas on other sites already identified without the unnecessary and high-cost relocation of the WWTP to allow housing redevelopment of that site.

Contrary to the views of the Applicant and the local authorities, the CWWTP relocation has no local planning justification based on a pressing need for the existing site to be redeveloped for housing.

The application is not on 'grey belt' and therefore remains one for 'inappropriate development' in the Green Belt, which will cause 'very high harm' to 'openness' and to the purposes and function of that Green Belt. None of the changes to Green Belt policy in the adopted NPPF, all of which relate to allowing development on 'grey belt', change that conclusion. No 'very special circumstances' exist to justify the development, which must therefore be refused by the Secretary of State.

The application is also contrary to other policies in the adopted NPPF, in relation to historic assets and use of agricultural land. The application remains contrary to the policies in the adopted local plans.

Section 4 concludes that there is no adopted local plan or settled proposals that would support the housing redevelopment of the existing WWTP site and there are unresolved constraints on both the amount and types of housing that would be possible if the relocation were to be permitted.

Section 5 concludes that the increased HIF grant cannot deliver 'value for money' and the unspent grant should be recovered for other, more essential public spending projects. The Secretary of State should refuse this application, and the Deputy Prime Minister should instruct Homes England to cancel the HIF agreement.

Yours sincerely,

A solid black rectangular redaction box covering the signature of Mrs Margaret Starkie.

Mrs Margaret Starkie

for Save Honey Hill Group