

Dear Mr Reed

DCO/CWWTPR24 - Submission regarding Adopted NPPF (December 2024)

I am writing in response to your letter of 20 January 2025 inviting representations further to the adoption of the updated NPPF in December 2024 and the application of this to the above application by Anglian Water (the Applicant), particularly regarding Green Belt and Housing.

1 – Application generally

The Secretary of State is obliged to apply the guidance in the latest adopted NPPF of December 2024, Planning Practice Guidance and local plans when considering and reaching a decision on the DCO application. There has been much discussion, many statements and letters from ministers, and various drafts in the consultation period leading up to the adoption of the NPPF, and all these must now be ignored as we have the final version. The policies in the NPPF must not be taken out of the context of the entire Framework, and the NPPF must be looked at in the round, as a whole.

2 - Green Belt

The adopted NPPF confirms the existing longstanding principles for protecting Green Belt.

The adopted NPPF recognises that some Green Belt land is of higher quality than others, and previously developed land ('grey belt') may be of lesser value, so that if it is absolutely necessary in exceptional circumstances to release some Green Belt land, this lesser quality grey belt could be considered provided it is in a sustainable location.

However by including these relaxations in specified circumstances, the adopted NPPF reinforces that high quality land in the Green Belt, not previously developed, which meets the fundamental purposes is to be protected.

The Applicant has selected part of the highest quality Green Belt land north of Cambridge which meets all the five fundamental purposes in the NPPF and the three purposes for the Cambridge Green Belt.

As accepted by the Applicant in the DCO hearings, this application is not an NSIP so there is no presumption in favour of development and it will be inappropriate development in the Green Belt unless it meets the permitted statutory exceptions including the tests in para 155 of the adopted NPPF. The proposed development (PD) would fail the relevant tests:

The PD site continues to meet all the criteria in the NPPF for high quality, valuable Green Belt. The relaxations for grey belt do not apply here. As an aside, by comparison with the PD site, other sites which the Applicant considered but discarded as part of its site selection procedure would currently have been considered grey belt. While the PD site currently meets all the purposes (taken together) of the Cambridge Green Belt, as shown by others including Save Honey Hill (SHH), if approved the PD would have the complete opposite effect and cause permanent, substantial 'very high harm' to the openness and other purposes of the Green Belt. This would extend to a very wide area north of Cambridge including mostly Green Belt land due to the characteristic open landscape and the slightly raised PD.

Given that the Applicant has stated that the WWTP does not need to move for operational reasons there is no demonstrable unmet need for the type of development actually proposed in the application. Even if (with no legal grounds to do so) you look through the smoke and mirrors to see that the only reason for this application is to release land for housing, as others particularly SHH have shown during the DCO hearings and in their submissions, the housing needs for Cambridge can already be met even without relocating the existing WWTP.

The PD site is not a sustainable location. The entire proposed demolition and construction would generate unnecessary carbon release, using a significant amount of cement and concrete and introducing these materials in quantity into good agricultural land which has never been developed. The PD would also generate increased traffic, despite the Applicant's proposals to mitigate this.

While in 'very special circumstances' there can be exceptions to the ban on any development, even for good quality Green Belt land, there cannot be 'very special circumstances' unless the potential harm to the Green Belt itself from the inappropriateness of the development and any other harm arising from the proposal is clearly outweighed by other considerations. None of the statutory list of exceptions applies to the PD site.

As effectively Cambridge has grown out to Fen Ditton and Milton, the PD site is the Green Belt gap between Cambridge and the next village at Horningsea. One of the continuing purposes in the adopted NPPF as contained in the adopted South Cambridgeshire local plan for the Green Belt, is to prevent exactly this type of pressure, ie unrestricted sprawl causing settlements to merge into Cambridge.

The adopted NPPF also protects good quality agricultural land. As above, the PD would involve the permanent loss of about 90 hectares of good agricultural land. This land has been known for centuries as having the potential to be particularly productive. It is 'best and most versatile' productive agricultural land which is needed for UK food security.

The PD site itself and the land around it make a strong contribution to the setting of Cambridge as approached from the north and east. The setting of Grade 11* Biggin Abbey which was built in the C13 by and for the Bishops of Ely, was visited by the Kings of England in the C13 and C14, and owned by Queen Elizabeth 1, would suffer permanent harm at the higher end of 'less than substantial' which under the adopted NPPF must be given considerable weight.

Applying the adopted NPPF the application therefore continues to be inappropriate development in Green Belt and should be rejected.

3 – Housing

This application is for consent to relocate the WWTP, not because it is operationally necessary but in order to release the site of the existing WWTP for housing. The WWTP is fully functioning and this would be an appalling waste of resources and taxpayers' funds in the current climate.

The initial NECAAP proposal was for housing, with mixed retail and employment. It is clear that since 2020 the principal pressure for development in the NECAAP sector has changed and is now commercial, for R&D and laboratory space. Private land owners surrounding the WWTP site are already moving to this. The Applicant has raised additional funds by agreeing to sell 5 hectares of the 'core site' for commercial development. The need is moving more to a commercial sector, served by employees probably arriving by train. The proposals for NECAAP will need to be very significantly revised because the conditions have changed.

As shown by SHH and others, there is no need to redevelop the entire existing WWTP site for housing. The numbers required for Cambridge can already be met from the existing allocations and permissions, and it is possible to include part of the existing WWTP site for housing without the relocation of the WWTP. It is disappointing that the local authorities did not carry out their commitments in the 2018 adopted local plans for robust feasibility studies including retaining the WWTP on a reduced part of its existing site. That would have enabled releasing the rest of the site for creative modern redevelopment as has been done elsewhere eg Rainham in Essex.

Social and affordable housing is needed in Cambridge but developers always prefer to build more profitable housing. Councils cannot force developers to bring forward plans for what the Councils are required by national policies to provide nor on the government's timetable. However the Cambridge housing market continues buoyant and resilient, and needs no encouragement.

It is very concerning that the Applicant has not made it clear how it proposes to meet the WWTP needs of the rapid increase in population the government proposes for Cambridge, if the PD is approved and the WWTP is relocated. The DCO application is understood to be for a WWTP of broadly similar capacity to the existing WWTP, with limited scope for expansion. That limit is imposed by the necessity of screening the PD. Screening is essential due to the exposed position of the PD site where the geology means that the WWTP could not be built sufficiently below ground to enable it to be hidden by trees - unlike the existing WWTP site. This results in

a very restricted footprint for the proposed new WWTP and the room for future development is likely only to last about 10 years. The Applicant has not made it clear what then happens.

Had the Applicant not chosen such an unsuitable site, scope for expansion into the future might indeed have lasted to the end of the century. The existing WWTP site enabled future planning. There is still no reason to move except that it is in the way of the vision of the current generation of planners whose thinking may well be overtaken by changing circumstances, as shown by changes since 2020. A city's WWTP provision is vital to its health and should not be relocated except in extremis. It is better planning to choose a site for the WWTP which is sustainable in the long term, can accommodate future expansion in the population, and leave it there. The existing site was well chosen for the city's WWTP, as demonstrated by its longevity, can be adapted and should be retained.

Yours sincerely

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