

From: Liz cotton [REDACTED]
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To: Cambridge Waste Water Treatment Plant Relocation
Subject: response to letter from the secretary of state

Follow Up Flag: Follow up
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Categories: SoS Consultation

Interested Party Reference number: CWWT – AFP051

Subject: Objection to the Relocation of Cambridge Waste Water Treatment Plant & Non-Compliance with NPPF 2024

Dear Sir/ Madam

I am writing in response to the invitation from the Planning Inspectorate to comment on the planning application to relocate Cambridge Waste Water Treatment Plant to Honey Hill.

This proposal is not in keeping with National Planning Policy Framework (NPPF) 2024 provisions

- It prioritizes commercial expansion over sustainable affordable and social housing delivery
- It misuses HIF resources, intended for housing, not commercial growth.
- It destroys Green Belt land and threatens a principal chalk aquifer, contradicting environmental sustainability goals.
- It worsens climate and biodiversity impact.
- It places any new housing in a polluted, noisy location next to A14 which is constantly monitored because of air quality concerns, failing to meet standards for healthy living conditions.
- It is not in the local plan and has not been properly scrutinized.

1. The Plan Contradicts Sustainable Development Goals

The NPPF states that development must balance economic, social, and environmental priorities. However, this relocation fails on all three fronts:

- **Environmental failure:**
 - Honey Hill is prime agricultural land, not "grey belt" or wasteland.
 - Destroying productive farmland contradicts UK food security, biodiversity commitments, and climate priorities.
Steve Reed describes grey belt as '*wasteland and old car parks*'
As Angela Rayner has stated: "*We will protect the best-value land.*"
 - Honey Hill is next to SSSI species-rich nature reserves Quy Fen and Wicken Fen. In fact the National Trust vision to extend Wicken Fen and guarantee the survival of all its rare and numerous species will not be fully realized if this relocation goes ahead.
- **Social failure:**
 - Cambridge City Council agreed in October 2022 that 8,350 homes for 13,500 working-age people alongside 15,000 jobs was an acceptable deficit. These are the figures cited in the relocation application by Anglian Water.

- However, commercial and R&D space has quadrupled, with no public explanation, further worsening the housing shortfall.
- The developers say in their masterplan presentation that the homes will be built at a slower rate than the commercial. Again this is a misuse of HIF money.
- The developers in their latest masterplan have committed to only 40% affordable homes in their commercial-led development and no social housing. This is a misuse of HIF money
- Economic failure:
 - This is not an essential infrastructure project
 - As Steve Reed has emphasized:

"Money for vital infrastructure should be ringfenced by water companies and spent as it is intended to be."

 - Anglian Water has admitted that upgrading the existing site would be both more cost-effective and environmentally sustainable.
 - The government should not be diverting housing funds to subsidize a water company and finance the unnecessary demolition and reconstruction of a fully-functional, recently upgraded sewage facility. This wasteful project includes constructing a massive, deep tunnel beneath the River Cam to pump sewage uphill 24/7 from its natural destination at the existing site to the proposed location at Honey Hill, creating a significant carbon footprint with no justifiable tangible benefit

2. HIF Funds Are Being Misused for Commercial Development, Not Housing

The Planning Inspectorate (PINS) has already questioned the justification for this project, stating:

"How is the compelling case justified if the redevelopment does not form part of this application, and the plans and proposals for such form part of an emerging local plan which has not yet been examined and found sound?"

The relocation is not part of a properly examined Local Plan. It is being forced through via HIF funding, which was intended for accelerated affordable housing delivery, not commercial expansion.

Angela Rayner has warned against speculative developments, stating:

"I urge all Members to speak to their local authorities to ensure that they have their local plans, because that is how we ensure that people feel engaged and part of the process--which is critical--and how we protect green belt and other areas by ending the speculative developments that we have been seeing."

3. Honey Hill Is an Environmentally Disastrous Location for a Sewage Plant

- It sits on a principal chalk aquifer, posing contamination risks to drinking water.
- Unlike the existing site, underground infrastructure is not possible, meaning the plant will be highly visible against the Fenland sky and an industrial eyesore in an open landscape

As Steve Reed has stated,

"Nature underpins all the government's missions. Without nature, there is no economy, no health, no food, no society."

Destroying Honey Hill's biodiversity and agricultural land contradicts the government's own priorities.

4. The Hartree Development Will Place Homes in an Unhealthy Location and an Unsustainable Location

- Hartree is next to the A14, one of the busiest and most polluted roads in the region. It is being constantly monitored for safety levels of pollutants, especially this stretch.

- Residents will not be able to open their windows due to noise and air pollution, leading to a reliance on energy-intensive air conditioning.
- This contradicts the government’s climate policies, forcing residents into high-emission living conditions while wasting agricultural land elsewhere.
- The carbon emitted as a result of the relocation makes a mockery of the sustainability claims. The PINS inspectors asked of the local council at the hearings on 18 October 2023

“Did that exercise of looking at the sustainability of the site take into account the sustainability implications such as embodied carbon and carbon in construction of the new waste water treatment plant? How can you be certain that taking into account such impacts wouldn’t tip the balance away from favouring the current development strategy? ”

The councillor’s response? *“It’s a really tricky question.”*

- Landsec’s latest master plan:
 - ✗ Only commits to 40% affordable housing, below the 50% benchmark set for Green Belt housing.
 - ✗ Has no commitment to prioritizing social rent, despite government recommendations.

“Green Belt housing should be built on ‘grey belt’—not on farmland.” — Angela Rayner

This is not sustainable planning.

5. There Are Better, More Sustainable Alternatives

- The current sewage site can still be upgraded—millions were spent just 10 years ago, and Anglian Water itself admits further upgrades are possible.
- New homes could be built on alternative planned sites that do not require HIF funding.
- HIF funds should be used where they are actually needed—in regions where developers are reluctant to build, rather than subsidizing commercial growth in an already high-demand area.

Yours sincerely,
Liz Cotton