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**Electronic submission only**

Dear Sir / Madam

**Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010 - Application by Anglian Water Services Limited for an Order Granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation project (CWWTPR)**

Cambridge City Council (CCC), acknowledges the publication of the letter dated 06 February 2025, requesting further clarification from both South Cambridgeshire District Council (SCDC) and Cambridge City Council on housing need calculations, the implications of the Cambridge Waste Water Treatment Plant relocation, and the Greater Cambridge Local Plan (GCLP).

Please note that a separate response has been provided by South Cambridgeshire District Council; however, for the avoidance of doubt, the content of both responses is identical. South Cambridgeshire District Council and Cambridge City Council (herein referred to as "the Councils") set out their response to each of the questions below.

***QUESTION 1: Do you agree with Save Honey Hill Groups SHHG's calculations in Table 1? If not, please explain.***

Councils' Response:

The Councils' position on the Save Honey Hill Groups (SHHG) Table 1 figures is as follows:

- *Previous Standard Method (immediately before NPPF Dec 2024): The Councils are in agreement.*
- NPPF Adopted Standard Method 2024 – The Councils are not in agreement. The total figure should be 2,309 (Cambridge: 1135; South Cambridgeshire: 1174)
- GCLP First Proposals 2021- The Councils are in agreement.
- GCLP Development Strategy Update 2023 – The Councils are in agreement.

Note: the latest standard method figures for indicative local housing need by district were published by Government on 12 December 2024<sup>1</sup>.

***QUESTION 2: Do you agree that, taking into account NPPF para 78(a) and the housing built since 2020, the GCLP will need to identify sites for 48,425 houses for the period 2020 – 2041? If not, please explain.***

Councils' Response:

The Councils do not agree for a number of reasons.

Firstly, the starting point for the housing requirement for the GCLP is now the new standard method identified in the NPPF 2024, which is a total of 48,489 (2,309 x 21 years) homes. If a 10% flexibility buffer were added to the new standard method that would mean providing a total supply of 53,338 homes as part of the new GCLP.

Using the Development Strategy Update 2023 evidence would result in a figure of 51,723 (2,463 x 21 years). If a 10% buffer were added that would mean providing 56,895 homes.

Both of these are higher than the First Proposals 2021 figure of 44,400 (2,111 x 21 years – rounded) and the 10% buffer that was added to give a figure of 48,840 homes.

The Councils have commissioned a refresh of forecast jobs and their relationship with housing, having regard to the latest standard method to understand the appropriate requirement for the next stage of the GCLP.

Secondly, SHHG refer to paragraph 78(a) of the NPPF in support of its case that a lower 5% buffer should now be used for the GCLP supply. However, paragraph 78 relates to the five-year housing land supply (5YHLS) and explicitly states: "The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period)." This is a separate and different point to considering whether the overall local plan requirement should have a buffer added for flexibility and if so, the scale of the buffer. SHHG is therefore not correct in its assertion that a 5% buffer should be applied based on paragraph 78(a).

The NPPF does not specify a flexibility buffer for a local plan requirement; however, standard good practice in plan making is to include a buffer, which is typically around 10%, the purpose of which is to give greater confidence that the full requirement will be delivered in the plan period.

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<sup>1</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

To give a local example, the adopted South Cambridgeshire Local Plan 2018 includes a flexibility buffer. At paragraph 46 of the South Cambridgeshire Local Plan (SCLP) 2018 Inspectors' Report<sup>2</sup> the Inspectors state:

*"..the Plan makes provision for over 23,500 new dwellings. This is above the housing requirement figure of 19,500 new homes and therefore allows a significant degree of flexibility. The fact that some 15,000 of these new dwellings will be provided from the early completions, existing allocations and sites with planning permission, gives confidence that the housing requirement will be met."*

The 10% buffer in the GCLP First Proposals (2021) was therefore included to provide flexibility and increase confidence in meeting the identified housing need. This is outlined in page 32 of the Greater Cambridge Local Plan First Proposals<sup>3</sup>.

Thirdly, page 3 of SHHG's response states that the GCLP First Proposals 2021 included "unrealistically high employment-led projections, which are methods no longer allowed under the adopted NPPF." However, this is not the case. Paragraph 62 of the NPPF describes the standard method as 'To determine the minimum number of homes needed'. Additionally, NPPF paragraph 69 states:

"Strategic policy-making authorities should establish a housing requirement figure for their whole area, ..... The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment."

The published GCLP evidence supporting the First Proposals 2021 looked at lower, central and higher scenarios for economic growth. It recommended that the central jobs scenario was the most likely, rather than the higher, having considered which it considered is the most robust for plan making purposes. A similar approach was taken in the evidence supporting the Development Strategy Update 2023. At that time, and on the basis of the previous standard method, the evidence concluded that a jobs-led approach would require a level of housing above the standard method, as set out in SHHG Table 1 and considered at Question 1 above. The Councils therefore considers that a jobs-led approach remains consistent with NPPF paragraph 69.

In the context of all the above, the Councils' refresh of forecast jobs and their relationship with housing will include consideration of the jobs supported by the new standard method, given the latter is now much higher than the previous standard method. Previously, the jobs forecast figure was higher than the jobs supported by the former standard method. The refresh of the evidence will consider whether there remains a case for a housing requirement higher than the standard method.

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<sup>2</sup> <https://www.scambs.gov.uk/media/17450/scdc-local-plan-final-report-2018.pdf>

<sup>3</sup> <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/First%20Proposals%20-%20FINAL%20FURTHER%20REVISED%2028.10.21-red.pdf>

Whilst the update of homes and jobs evidence work is not yet completed, even if the new standard method were taken as the new requirement over a 21-year plan period, as set out above, this would require a higher level of housing supply to be identified in the GCLP than in the First Proposals 2021. The appropriate housing requirement and any additional flexibility buffer will be determined in the draft GCLP later in 2025.

It is also relevant to note that the Councils agreed a new Local Development Scheme<sup>4</sup> in January 2025 that sets out an updated timetable for preparing the GCLP. The report to Members<sup>5</sup> also advised that “Given the external factors explored in the November Timetable Update which have delayed the plan’s progress, and the revised timetable set out in this report, officers are exploring an appropriate revised plan period to ensure NPPF compliance.” (paragraph 11) This reflects the requirement in the NPPF to “look ahead over a minimum 15-year period from adoption” (paragraph 22 of the NPPF). As such there will be an extended plan period for the GCLP, anticipated to be until at least 2043 and potentially longer. In that context, large strategic scale sites such as NEC can play an important role in continuing to deliver homes to meet needs over the longer plan period.

Notwithstanding the comments above in relation to the robustness of the Councils’ evidence on jobs forecasts and housing requirement, it is also worth bearing in mind the Government has stated its intention to seek continued high levels of economic and housing growth in the Cambridge area, as discussed in the Councils’ LIR starting at paragraph 1.113.

***QUESTION 3: Do you agree with SHHG’s assessment that, if the WWTP relocation is not approved, the GCLP will need to identify alternative sites to deliver 2135 houses in order to meet the assessed need for the period 2020 - 2041? If not, please explain.***

Councils’ Response:

Following the Councils’ response above to **Question 2** disagreeing with SHHG’s view of the housing figure to be provided for through allocations in the GCLP, in part due to the assertion relating to a reduced buffer, it follows that the calculation made by SHHG is also not correct in relation to its assertion that housing needs in the GCLP can be met without the need to relocate the Cambridge Waste Water Treatment Plant (CWWTP) and that with reduction in provision at NEC, alternative sites for only 2,135 homes would need to be found.

Looking initially at the First Proposals, the table at page 32<sup>6</sup> showed that against the figure of 48,840 homes stated in the response to question 2 above, there was a current supply from permissions, windfalls and the adopted 2018 Local Plan allocations of 37,200 homes, leaving a balance of 11,640 homes to be allocated through the GCLP. The supply to deliver the balance included delivery of 3,900 homes at NEC by 2041. If the CWWTP remained in situ

<sup>4</sup> <https://www.greatercambridgeplanning.org/media/wwpktav/greater-cambridge-local-development-scheme-2025-final-1.pdf>

<sup>6</sup> <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/First%20Proposals%20-%20FINAL%20FURTHER%20REVISED%2028.10.21-red.pdf>

this would reduce to 1,350 homes (as stated by SHHG in footnote 3 of their response) resulting in a loss of 2,550 homes needing to be re-provided elsewhere.

However, looking at the new standard method minimum requirement of 48,489 homes as set out in **Question 2**, if a 10% flexibility buffer were added to the new standard method, that would mean providing a total supply of 53,338. On the same assumptions as for the First Proposals on current supply, that would leave a balance of 16,138 homes to allocate through the GCLP (53,338 – 37,200). Taking account of supply, including 3,900 homes at NEC, would leave a balance of 4,498 homes to find (16,138 – 11,640). However, the net balance with the CWWTP in situ would increase to leave a balance of 7,048 homes (4,498 + 2,550).

Note also the comment made by the Councils in their LIR at paragraph 1.99 that without the regeneration of the existing CWWTP site and wider area, and the provision of a higher quality environment, it is uncertain whether the landowners of parcels outside the odour contours identified housing would continue to support residential development in favour of other more suitable uses such as office and lab space. If this is not the case, the provision of housing at NEC could reduce below the 1,350 homes identified as the maximum with the CWWTP in situ. This increase the number of homes to be re-provided elsewhere

The Councils consider it unrealistic to seek to rely on bringing forward the remaining balance of 4,498 homes (or 7,048 homes without NEC) from the allocations and permissions already granted on major sites around Cambridge to be delivered by 2041 (explained by the SHHG at footnote 4 as being those sites “Intended in the First Proposals to be developed post 2041”). The housing trajectory included in the plan to be submitted to government for Examination, and as presented in the First Proposals, must be demonstrated to be realistic and deliverable for each site – this element of the plan has been supported by our Housing Delivery Study (HDS 2021)<sup>7</sup>, which has reviewed national and local evidence on realistic delivery rates at sites of different scales and locations. The largest proportions of annual housing delivery in the GCLP are at the strategic scale locations. At First Proposals the HDS informed increased annual housing delivery assumptions for adopted allocations at strategic sites in compared to previously used assumptions, including 350dpa at urban extensions and 300dpa at new settlements. The HDS does not present evidence supporting a higher annual rate beyond these increased rates for such sites. As such it is not realistic to rely on bringing forward delivery on these major sites beyond that already assumed in the trajectory.

Further to this, the Councils strongly disagree with the statement 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”. While adopted allocations and permissions provide a very significant supply of housing, for the period 2020-41, when compared against the December 2024 Standard Method this presents a clear requirement to plan for more homes in the emerging Local Plan.

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<sup>7</sup> <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/Housing%20Delivery%20Study%20for%20Greater%20Cambridge%20%28AECOM%2C%20October%202021%29.pdf>

It is also relevant to note that with the extension of the local plan period, the shortfall will increase further. The full scale of the North East Cambridge Area Action Plan (NECAAP) proposals for NEC enabled by relocation of the CWWTP, including 8,350 homes, would enable delivery to continue at the rate of 350 homes a year, consistent with our housing delivery evidence, throughout the extended plan period, whilst with the CWWTP in situ, the balance to find would require further additional sites elsewhere.

***QUESTION 4: Do you agree with SHHG's assessment that some assessed housing need could be met during the plan period outside South Cambridgeshire? If not, please explain.***

Councils' Response:

The Councils have been clear that the area should make its proper contribution to housing to support economic growth in the Greater Cambridge area, rather than promote additional commuting by asking our neighbours to meet some of our housing needs. That becomes even more important given the new mandatory standard method where the expectation is that it is the minimum number of homes to be provided. NPPF paragraph 11b(ii) makes clear that there is an expectation that local plans should, as a minimum, provide for objectively assessed needs for housing and other uses unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, making the bar high in terms of any suggestion that housing needs should not be met in full within Greater Cambridge, notwithstanding the outcome of the CWWTP DCO.

Our neighbours have indicated through the duty to cooperate that they did not wish to, or were unable to, accommodate unmet housing need arising in Greater Cambridge (GCLP First Proposals Duty to Cooperate Statement of Compliance<sup>8</sup>, p11). Our neighbours have also seen a significant uplift in their standard method number of homes, which makes it even less likely that they would be willing or able to take some of Greater Cambridge's needs.

***QUESTION 5: Do you agree, in light of the HDT results published in December 2024, that NPPF para 78(c) does not apply to the assessment of the Councils' housing needs? If not, please explain.***

Councils' Response:

The Councils agree that NPPF paragraph 78(c) does not apply to assessment of housing needs in Greater Cambridge as they apply to decision making. The latest set of HDT results were published in December 2024<sup>9</sup>. The result for Cambridge is 114%. The result for South

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■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

Cambridgeshire is 153%. Therefore paragraph 78(a) applies for the purposes of considering housing land supply. There are also no consequences as to how planning applications should be determined under NPPF paragraph 78(b) resulting from the HDT results published in December 2024 for Cambridge or South Cambridgeshire.

***QUESTION 6: In light of all of the above, and having regard to the evidence considered during the Examination, do you maintain the position advanced in the Councils' LIRs that, if the WWTP relocation is not approved, the Councils will need to identify and allocate other strategic scale sites within Greater Cambridge to meet the area's need for housing and employment and that this would likely involve the allocation of Edge of Cambridge Green Belt sites or new settlements. Please explain your answer.***

Councils' Response:

Yes, this remains the Councils' position. As explained in the response to Q3, whether the housing requirement for the GCLP ends up at the new standard method or a different higher figure, there is now a substantive shortfall in housing supply that the Councils need to make up in the draft GCLP over and above the proposed allocations in the First Proposals, even with the delivery of the full regeneration of NEC envisaged in the NECAAP.

There are no further substantial sites within the urban area of Cambridge that can be allocated and the choice for further strategic sites will inevitably involve consideration of sites on the edge of Cambridge in the Green Belt or new settlements. The Councils address this point in their Local Impact Reports (LIRs) in the section starting at paragraph 1.78 and maintains their position on this key point. If NEC is not able to be a key part of the development strategy in terms of providing substantial levels of housing, that will put further pressure on alternative locations that will be less sustainable than NEC.

The Councils have been clear in their LIRs (paragraph 1.75 and 1.77) and in the evidence supporting the GCLP that NEC is one of the most sustainable locations in Greater Cambridge, being a brownfield site within the urban area of Cambridge that is particularly well served by existing and proposed sustainable transport infrastructure.

***QUESTION 7: Do you agree that the permitted or proposed development in North East Cambridge identified by SHHG undermines the original vision in the NECAAP and will be practically difficult, if not impossible, to resolve in a revised NECAAP? Please explain your answer***

Councils' Response:

It is agreed that the North East Cambridge Area Action Plan (NECAAP) would require a review before progressing to Regulation 19 publication, given the significant time that has passed since its agreement in January 2022 and the ongoing Cambridge Waste Water

Treatment Plant (CWWTP) DCO process. This review would need to take into account several planning permissions granted in the meantime and include consideration of implications for the vehicular trip budget, which remains a key factor.

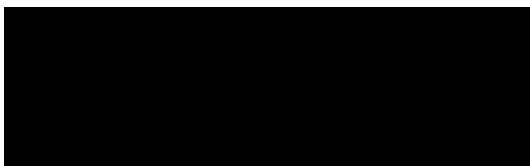
A critical element in achieving the vehicular trip budget is the delivery of a substantial level of residential accommodation within the North East Cambridge (NEC) area that is essential to offset the number of trips generated by continued employment development in the area. This would support a development model that enables residents and workers to travel primarily by walking, cycling, or public transport. Without the relocation of the existing CWWTP and delivery of housing on the sites of the plant and the surrounding area currently constrained by the odour contours, there is anticipated to be a limit to the amount of employment development that can be delivered within the trip budget.

SHHG makes various comments regarding the emerging planning application for the CWWTP site and its surroundings. However, a planning application has not yet been submitted. In the absence of a settled development plan policy for NEC, and given the length of time involved, proposals are inevitably coming forward and are being assessed on their respective merits through the development management process, taking into account all material considerations. It would be inappropriate and premature for the local planning authority to draw conclusions on the merits of an emerging proposal that has not yet been formally submitted for consideration and determination.

Notwithstanding this, there is no reason to assume that a high-quality, residential-led redevelopment of the CWWTP site and surrounding land cannot be achieved, making good use of this highly sustainable location.

The Councils remain firmly of the view that the Proposed Submission NECAAP, which implements the adopted 2018 Local Plans policies, provides a strong indication of the scale, mix and type of development that can be achieved on this land. Enabling the relocation of the CWWTP would in itself be a strong catalyst for bringing forward the rest of the NEC vision that was set out in the NECAAP once Housing Infrastructure Funding (HIF) had been secured, even though it had to be predicated on the relocation of the CWWTP taking place.

Yours faithfully



Stephen Kelly  
Director of Planning & Economic Development  
*On behalf of Cambridge City Council*