

Appendix A - Statement from Mrs. Jennie Conroy

SCDC Cabinet Meeting 10th January: Agenda item 8

Statement for Cabinet in support of a postponement in agreement of the proposed submission NECAAP (Reg 19) and Supporting Evidence

1. Statement

National Planning Policy requires developing local plans to be flexible to accommodate changes in circumstances; what appeared to be the most appropriate course of action to attain a planning objective in one year may be less apparent a few years on. It is also a requirement that all reasonable alternatives have been identified and considered, that the plans are achievable and reflect National and Local Planning Policies¹.

There have been a number of changes and new circumstances since SCDC voted to support AW's application for HIF funding enabling AW to start the process of seeking a viable alternative site for the CWWTP in order to release the brownfield site, from which it currently operates, for housing. This is also relevant with regard to the objectives of the time table specified in the Local Development Scheme, in this case to progress to formal agreement by the Councils of the proposed submission NECAAP (Reg 19) at this time, 2 years ahead of public consultation, with an explicit objective to facilitate a successful DCO examination: 'The formal agreement by the Councils of the Proposed Submission AAP will be an important factor in the DCO Examination process to demonstrate commitment to development of the area'².

The size and scale of NECAAP as currently presented and the now proposed relocation of a large scale industrial waste water treatment plant in to open Green Belt, in close proximity to Cambridge City and principal Conservation Areas, will have significant impact on Cambridge itself. However, it will be the population and electorate served by SCDC that will be most effected; in particular, Milton from the high population growth on its doorstep and impact on existing green infrastructure and, as a result of the relocation of CWWTP, the villages of Horningsea, Fen Ditton, Stow cum Quy & Lode.

It is argued that the changes that have occurred, those that remain uncertain and new information that has come forward since the initial support behind the relocation project and evidenced below, are such that it would be in the best interest of SCDC and the population it serves to postpone agreement of the proposed submission of NECAAP (Reg 19) until after the outcome of the DCO and Public Consultation (Reg 18) of the emerging Local Plan First Proposals.

It is important for SCDC to retain flexibility and influence in the planning process with regard to NECAAP, size, scale, etc; to retain effective scrutiny and influence over the design and mitigation measures AW put forward for the new plant at Reg19 of the DCO and to be open to alternatives within the developing Local Plan that are achievable, most compatible with proposed Local Planning Policies and in the best interest of the populations SCDC serve.

The latter will be best achieved, and in keeping with recent guidance from Greater Cambridge Shared Planning Service that the DCO application is 'not a project or proposal within the scope of the emerging Greater Cambridge Local Plan or AAP to influence'³, to postpone the agreement of the proposed submission of NECAAP (Reg 19) to allow the DCO to be examined on its own merits without further direct influence by SCDC and to be open to alternatives and outcomes of the Public Consultation on the emerging Local Plan First Proposals.

2. Supporting Evidence

Changes and New Circumstances since SCDC's support for HIF funding and the principle of CWWTP relocation that now qualifies a postponement in agreement of the proposed submission of NECAAP (Reg 19) until after the outcome of the DCO Examination:

i. AW Site Selection

- AW put forward a short list of 3 sites out to public consultation, all of which were in SCDC's own Green Belt adjacent to the historical villages and conservation areas it represents, providing no alternative than development in the Green Belt. The final site selected, Honey Hill was identified amongst the three sites by AW's own Environmental Assessment as being the site that a new industrial plant would have the most significant impact on in terms of purpose of Green Belt, landscape and historical assets and that at best, mitigation measures would be able to reduce the RAG rating from Red to Amber⁴. This controversial decision by AW to short list sites in the Green Belt only and the final site selected, jeopardises the Aims & Vision many Policies laid out in both the existing and emerging Local Plan eg protection of: Green Belt, Historical Assets, Green Infrastructure etc.⁵
- From a sustainability point of view, there is no published intention to increase capacity of the new CWWTP or longevity beyond that of the existing plant. Further, AW state the intention is for the new plant to operate at carbon neutral; however it is not yet clear how this will be calculated, for example, AW will be retaining the historical practice of bringing wet sludge in via multiple daily HGV's from beyond the Cambridge Catchment across the wider Region, providing sludge treatment services for twice the population of Greater Cambridge,⁶ a practice that carries high carbon cost. Further, it is not yet known how many years it will take for any carbon savings in the operation of the new plant to offset the carbon expenditure of decommissioning a fully functioning plant, de-contaminating the land to be fit for housing, building the new plant and extensive transfer tunnels to carry waste from existing pipe networks at Milton to the new plant.

Before committing any further action that will effectively enable and support a successful DCO application, SCDC should determine they have scrutinised the plans and are satisfied with the mitigation measures proposed at Reg 19. of the DCO and postpone agreement of the proposed NECAAP submission (Reg 19) until after the DCO submission.

ii DCO Application

- AW informed GCP they were to pursue a DCO for the relocation at the time the short listed sites were announced, determining the planning process for the relocation would be independent of the Local Plan and standard Local Planning Public Consultation processes. This has meant by the letter of planning law, NECAAP and the relocation of CWWTP are independent, however they are inextricably linked; AW are only pursuing an alternative site in order to enable joint councils to build houses on the site they currently operate from; there is no operational requirement for AW to relocate⁷. This separation of planning process has in effect decoupled the two projects. This has had implications in the way costs and benefits of NECAAP have been portrayed in local planning documents such that the merits of NECAAP 'building on a brownfield site with good sustainability criteria' are promoted with no reference to the consequences or costs to the communities SCDC represent ie moving a fully functioning, future proofed CWWTP to an area of high quality Green Belt within 1 mile of the existing plant; within 500m of 3 conservation areas and historical assets within them; close proximity to historical villages and a landscape recognised in numerous Green Belt studies as forming an important aspect of the character and setting of Cambridge City.
- The absence of reference in local planning documents to the cost of pursuing NECAAP as above, in effect blind siding the public, has raised concerns by the public and Council members at scrutiny committee about the lack of transparency of NECAAP documentation and in turn the emerging Local Plan First Proposals (Reg 18)⁸. In response to concerns raised, Greater Cambridge Shared Planning Service have advised that : 'The DCO process is an entirely separate statutory planning process from the plan-making process which is being undertaken in relation to the Area Action Plan and as such it will be determined under different planning legislation. It is therefore not a project or proposal within the scope of the emerging Greater Cambridge Local Plan or AAP to influence.'⁹

To prevent the risk of any further apparent bias or influence towards the relocation within Local Planning Process it would be prudent to postpone agreement of the proposed NECAAP submission until after the DCO submission and allow the examination to be undertaken on its own merits.

iii Emerging Local Plan, First Proposals

- SCDC elected to include NECAAP in the emerging Local Plan First Proposals. The outcome of the Public Consultation (Reg 18) is yet to be published. During the consultation phase much was raised in the media about the housing and employment growth target in the context of sustainability (et Water infrastructure), impact on existing communities and requirement, given the impact in the longer term of COVID on home working, demand for high density urban living, change in commuter patterns etc. Growth and delivery targets will be revisited before the next stage of the emerging Local Plan, Reg 19, they may be maintained or

reduced, a reduction from the Medium + Growth Option to Medium would alone reduce the additional housing allocation requirement by 2,500 homes and would have a significant impact on the new site allocations including the 4,000 allocated to NECAAP in the plan period.

- Greater Cambridge Shared Planning Service have asserted that 'neither the emerging Local Plan nor NECAAP require the relocation of CWWTP, though both plans are being prepared on the basis that the WWTP will be relocated'.⁵ Cambridge Airport now presents as a realistic alternative to NECAAP for major housing development on brownfield within Cambridge and new homes being available within a similar time period¹⁰
- The site compares well in the Sustainability Assessment for transport with NECAAP but in contrast attains a high rating for Green Infrastructure.¹⁰ Focusing on Cambridge Airport as the alternative major housing development within Cambridge City boundary would remove the risks to the Aims & Vision of the emerging Local Plan and contravention of Policies associated with the impact of unprecedented high level of densification, stress on existing Green Infrastructure and the necessity to relocate CWWTP to the Green Belt and, as a consequence, would have less cumulative negative effect on the communities served by SCDC. 3,000 homes have been allocated to Cambridge Airport in the plan period with a further 4,000 capacity beyond. With forward planning and mixed development it would be reasonable to increase the allocation within the local plan period by 1000 .
- An employment led development at NEC with a matching employment target of 15,000 new jobs with new housing on the fringes, as identified in the existing Local Plan,¹¹ remains an alternative option for NECAAP removing the necessity to relocate CWWTP to fulfil current housing targets for the area. The 4,000 homes allocated to NECAAP in the emerging Local Plan could in this case be redistributed amongst the new site allocations, for example an additional 1000 at Cambridge Airport, an initial 1000-2000 allocation Cambridge Bio-Medical Campus and an initial 1000-2000 allocation Areas of Major Change. In the event of a reduced growth target in the emerging Local Plan clearly any re-distribution would be easily accommodated within the new site allocations. The capacity remaining at Cambridge Airport beyond the plan period of 3000 homes would absorb the majority of the 4000 balance remaining of the full current target ambition for NECAAP which is in the order of 8000 homes.

On this basis it would be appropriate to postpone submission of NECAAP Reg 19 until after the outcomes of the consultation on the emerging Plan First Proposals (Reg 18) are known and growth options are reviewed in the context of sustainability and the impact of COVID on home working, housing demand and commuting patterns in order to retain flexibility and every opportunity to best represent the communities SCDC serves as the emerging Local Plan develops.

3. References

1. [National Planning Policy Framework 2021](#)

2. [GCP Local Development Scheme 2020](#)

3. Greater Cambridge Partnership Service Nov 2021 : Report to Joint Local Planning Advisory Group – Item NECAAP : Proposed Submission (Regulation 19) From Stephen Kelly – Joint Director for Planning & Economic Development

4. [AW Final Site Selection Environmental Assessment](#)

5. [Greater Cambridge First Proposals 2021](#)

6. [AW Environmental Scoping Report 2021](#)

7. HIF Business Case : Cambridge Northern Fringe East (CNFE) 2018

8. [Agenda Document for SCDC Cabinet 10 Jan 2022 - Scrutiny & Overview Committee Update](#)

9 Greater Cambridge Partnership Shared Planning Service Dec 2021 – Written Response to Public Question at Scrutiny & Overview Committee

10 [GCDP Development Strategy Options Nov 2021](#)

11 [SCDC adopted Local Plan 2018](#)

Jennie Conroy – Resident Fen Ditton

Jennie.conroy@btinternet.com