

Sustainability Assessment - Comments

The single driver behind Anglian Water (AW) pursuing a relocation of the CWWTP is the request from the joint Councils for AW to test a viable alternative site to fulfil the Councils' vision for North East Cambridge as represented in the area action plan NECAAP, adopted by Council into the emerging Greater Cambridge Local Plan First Proposals Policy S/NEC. Both plans have been developed with the assumption CWWTP will relocate, but neither are dependent on it (S Kelly Nov 2021). Despite this, neither the SA nor SEA in either plan identify or assess the significant effects the relocation will have on the site identified by AW as a 'viable' alternative within the Greater Cambridge area.

The existing CWWTP underwent extensive investment in 2016, at the time it was described by the Environment Journal as being future proofed for decades to come and to have secured its position as the eastern region's green energy generating giant; it has capacity to absorb the housing targets of both the existing and emerging Local Plan including Waterbeach Newtown. This fact, that there is no operational need for CWWTP to relocate even with the ambitious housing targets of these Local Plans, has meant AW are dependent on external funding, in this case £227m of public money via HIFF. Joint Councils supported the HIFF application and thus the principle of relocation of the CWWTP to enable the fulfilment of the vision for NECAAP, however this was before AW undertook and concluded on a 'viable' site selection.

The site identified by AW is an area subject to the emerging Local Plan in the Cambridge Green Belt; identified in the supporting Green Belt Study (2021) as an area of high sensitivity where development would have 'very high harm' to Green Belt purpose. This 'very high harm' is attributed to the area not least because of the openness of the Green Belt but also the contribution three adjacent Conservation Areas, historical assets and medieval villages within them make to the Historical Setting of Cambridge. Significant Green Infrastructure also identified in the emerging Local Plan will be impacted by the relocation including: the River Cam Corridor; SSSI sites; registered Historical House and Gardens; extensive PRow network; National Trust Wicken Fen Vision.

Since the site election for relocation by AW there has been no public consultation on the consequences or environmental effects of the Councils pursuing NECAAP /S/NEC in the context of the relocation to Honey Hill, nor has any alternative vision for NECAAP been presented in the emerging Local Plan First Proposals. This is despite it being clear the relocation as proposed will be contrary to numerous Policies laid out in the emerging Local Plan First Proposals and in the case of densification, the CPIER report (2018) that informs the high growth objectives of the emerging Local Plan, stating that to sustain high economic growth development needs to be sensitive to maintaining one of the key attractions to Cambridge, that is the pleasant environment. The latter not only being the Historic City Centre but its setting including the historic Green Belt (the first nationally to be established) and the necklace of villages within it.

The assessment of the effects of NECAAP/S/NEC Policy have been deferred to AW and the DCO planning process with the assertion that as the relocation is a separate planning process 'it is therefore not a project or proposal within the scope of the emerging Greater Cambridge Local Plan or AAP to influence.' (S Kelly Nov 2019). This position seems quite extraordinary, including NECAAP/S/NEC in the Local Plan First Proposals but excluding sufficient or significant information about the effects of the fulfilment of the Policy for effective public consultation at Reg 18 in itself is

contrary to the principals and regulations of the SA/SEA and will influence the Consultation and could be construed as effecting bias. This anomaly is further exacerbated given that neither the emerging Local Plan nor NECAAP are dependent on the relocation (S Kelly Nov 2021).

If it is regulatory to exclude reference to the site selected for relocation or subjecting the full effect of NECAAP to the SA/SEA within the emerging Local Plan, it is recommended in the interest of an informed and fair public consultation NECAAP is excluded from the Local Plan until after the outcome of the DCO is known and that an alternative is presented in the emerging Local Plan that can be subject to SA/SEA and an informed, evidence based public consultation at Reg 18.

S Kelly Nov 2021 : NECAAP : Proposed Submission (Reg 19) Report to Joint Local Planning Advisory Group

Environmental Journal July 2026 : Cambridges water recycling centre looks to the future:

<https://environmentjournal.online/articles/cambridges-water-recycling-centre-looks-future/>