Proposed Submission Greater Cambridge Local Plan

Consultation Response from Fen Ditton Parish Council

Review of Greater Cambridge Shared Planning Regulation 19 Draft Local Plan September 2026

- *Fen Ditton Parish Council which includes the Marleigh Park development represents approx 1,600 residents, rising to an estimanted 3,400 when Marleigh is fully built out.*

Representations 1) to 24) are a common view shared between Fen Ditton Parish Council (FDPC) and Save Honey Hill (SHH), a community group. Representation 25 is specific to FDPC. FDPC's authorisation has been given by the Chairman. SHH's authorisation has been given by the Chair.

1) Policy S/AMC/NEC & Spatial Strategy (Paras 2.56–2.59) – Deliverability and Effectiveness

Target Policy/Section: S/DS Policy S/AMC/NEC (North East Cambridge) & Spatial Strategy for the Cambridge Urban Area (Paragraphs 2.56 to 2.59)
Status: Object – Unsound (Ineffective)

Main Response:
Policy S/AMC/NEC (Spatial Strategy) is unsound because it fails the Effectiveness test set out in the National Planning Policy Framework (NPPF) Paragraph 36(c) [36c].

Policy S/AMC/NEC designates North East Cambridge (NEC) as an "Area of Major Change" with the existing CWWTP retained in situ and strengthens protections for the Cowley Road Industrial Area and Aggregates Sites. This effectively rules NEC out as ever being a strategic housing allocation. Further, viable commercial permissions have already been submitted or granted which are reducing the space for housing and supporting the pre-HIF grant vision of mixed employment-led development for this area.

However the Spatial Strategy for the Cambridge Urban Area (Paragraphs 2.56 to 2.59) is confusing and inconsistent with the Policy. The text continues to refer to the Councils' 'preferred vision' should funding become available for the relocation of the CWWTP. Reference to this 'preferred vision' should be removed because:

a) It is misleading as there is no adopted 'preferred vision' .
b) Without sufficient funding the DCO for the relocation of the CWWTP could not have been granted. No current source of funding exists and no alternative source of funding is identified. The 'preferred vision' in the Spatial Strategy is therefore not deliverable and would be unsound.
c) Following the August 2025 withdrawal of the Housing Infrastructure Fund (HIF) grant, the housing trajectory has been revised, and NEC housing is no longer required to meet the district's housing needs. Mixed housing and commercial development can and is proceeding with the CWWTP in situ as set out in the Policy.

The project cost growth of the CWWTP relocation has increased enormously since the original business case was approved. The base costs of the relocation project have escalated significantly beyond the original "short tunnel" estimate of £167m, which including additional contingency formed the initial £227m Housing Infrastructure Grant that was used to justify the DCO application, as shown in the CWWTPR Funding Statement [REP6-002, 264]. In autumn 2025 the overall costs were estimated by the Councils in to be in excess of £400m and funding support up to £700m was requested. No new source of funding is identified to support the 'preferred vision'.

The Councils' own December 2023 Local Impact Report (LIR) (Paragraph 6.104) submitted to the CWWTPR DCO Examination and to the Sec of State DEFRA stated that: *"A plan that was dependent upon an allocation, which it was not possible to show is deliverable or alternatively sought to require the site occupant to leave, would ultimately not be found sound."* Furthermore, the LIR notes at Paragraph 6.26 that the CWWTP relocation was excluded from the adopted 2018 Local Plans precisely because it was not viable or deliverable in the absence of funding, and to include it and/or any development that depended upon it, therefore, would have been unsound : "*a policy requiring its relocation would not have been sound."*

While the Policy does not include development at NEC which depends on the relocation, the Spatial Strategy continues to refer to the speculative 'preferred vision', which is confusing, contradicts the Councils' own established soundness thresholds and fails the Effectiveness test (NPPF Paragraph 36c) [36c, 186]. The Regulation 19 Plan put forward to the Sec of State for approval should not include speculative alternatives but should set out only the Councils' plan which is deliverable over the Plan period.

The Spatial Strategy should say clearly that it is 'highly unlikely that funding will ever be available for relocation of the CWWTP' and that if it ever is available the Council would need to amend the NEC Policy and subject it to further consultation and Local Plan Examination.

Summary (<100 words):
Policy S/AMC/NEC is ineffective under NPPF Paragraph 36(c) [36c]. Although the Policy assumes an in-situ CWWTP the supporting Spatial Strategy (Paragraphs 2.56 to 2.59) continues to refer to a 'preferred vision' of a relocation of the CWWTP for which no funding is identified and which is undeliverable. This is confusing, misleading, conflicts with the Policy, and contradicts the Councils' own soundness threshold of being deliverable. To be sound, the Plan must remove all reference to this 'preferred vision' and uncertain relocation and focus on the sustainable optimisation of NEC with the existing CWWTP in-situ

Change Requested:
Amend the Spatial Strategy for the Cambridge Urban Area (Paragraphs 2.56 to 2.59) and Policy S/AMC/NEC to remove all reference to the 'preferred vision' and any strategic reliance, predication, and housing-capacity assumptions associated with the future relocation of the CWWTP. The Spatial Strategy should say clearly that it is highly unlikely that funding will ever be available for relocation of the CWWTP and that if it ever is available the Council would need to amend the NEC Policy and subject it to further consultation and Local Plan Examination.

2) Policies Map & Policy S/AMC/NEC – Spatial Transparency

Target Policy/Section: Policies Map & Spatial Strategy for the Cambridge Urban Area (Paragraphs 2.56 to 2.59)
Status: Object – Unsound (Not Justified / Inconsistent with National Policy)

Main Response:
The Policies Map is unsound because it is unjustified and inconsistent with national policy, failing to comply with Paragraph 23 of the National Planning Policy Framework (NPPF). Despite the introduction of Policy S/AMC/NEC assuming an in-situ plant, the Spatial Strategy for the Cambridge Urban Area (Paragraphs 2.56 to 2.59) continues to refer to the "preferred vision" of relocating the CWWTP to Honey Hill in the Green Belt [2.58]. This is meaningless as there is no adopted 'preferred vision'.

Further, while the Policies Map highlights the strategic redevelopment boundary and anticipated development "benefits" of the North East Cambridge regeneration, it entirely omits the corresponding physical and spatial "costs" of the infrastructure upon which this 'vision' is predicated.

The Cambridge Waste Water Treatment Plant Relocation (CWWTPR) Development Consent Order (DCO) would permit relocation of the CWWTP from NEC to Honey Hill requiring a permanent land take of 34 hectares for the operational facility within a total of 94.0 hectares of Green Belt land directly affected within the DCO Order Limits. Table 4.1 of the Greater Cambridge Green Belt Assessment (GCGBA) (July 2026), identifies Parcel OA2, including Honey Hill, as having a GCGBA and GCGBA 2026 Review harm rating, for release of this parcel from the Green Belt, of 'Very High'. The CWWTPR Examining Authority's (ExA) Report and the Secretary of State for Defra's DCO Decision Letter (6 June 2025) confirm that this project constitutes "inappropriate development" causing harm to Green Belt openness. NPPF Paragraph 23 requires all land-use designations and strategic infrastructure requirements to be illustrated on the policies map.

Suppressing the significant Green Belt land take required for the relocation while continuing to include the 'preferred vision' in the Spatial Strategy is inconsistent and makes the Policies Map misleading and non-compliant.

Summary (<100 words):
The Policies Map fails NPPF Paragraph 23. It illustrates the redevelopment benefits of North East Cambridge but omits the high cost of the CWWTP 'preferred vision' relocation site at Honey Hill, requiring a 34-hectare permanent operational footprint and affecting 94.0 hectares of Green Belt. The DCO confirms this is inappropriate development causing moderate openness harm and the GCGBA states 'Very High' Harm for release of this land from Green Belt. Suppressing this cost implicit in the 'preferred vision' in the Spatial Strategy for the Cambridge Urban Area (Paragraphs 2.56- 2.59) is unjustified, lacks necessary planning transparency and is misleading.

Change Requested:
Remove all reference in Policy S/AMC/NEC to the meaningless 'preferred vision' to relocate the CWWTP as there is no adopted 'preferred vision' and it is not viable or deliverable following the

withdrawal of the Housing Infrastructure Funding grant. The Policies Map will then be consistent with the Spatial Strategy and compliant with the Councils own Local Impact Report 2023 para 6.104 .

5) Policy S/AMC/NEC & Evidence Base – Odour and Feasibility

Target Policy/Section: Policy S/AMC/NEC & Evidence Base (Odour and Feasibility)
Status: Object – Unsound (Not Justified by Proportionate Evidence)

Main Response:
Policy S/AMC/NEC is unsound because its restrictive approach to development on the North East Cambridge site is not justified by up-to-date, proportionate evidence, contravening National Planning Policy Framework (NPPF) Paragraph 31 and Paragraph 32. Adopted Policy SS/4 of the 2018 Local Plan required comprehensive feasibility investigations into redevelopment *"either elsewhere or on the current site."* Instead of conducting a genuine, transparent study into modern on-site consolidation and enclosure, the Councils have dismissed the potential for on-site footprint reduction and odour control, thereby severely limiting the prospect of delivering housing and commercial development closer to the existing facility. They have relied on the outdated 2018 Odournet study, which purely modelled the *existing open-air configuration* of the plant.

The Save Honey Hill (SHH) Community Group provided substantial evidence to the CWWTPR DCO Public Inquiry (within Representation REP1-171) demonstrating that modern, enclosed wastewater recycling facilities can successfully coexist with dense residential development. For example, the Thames Water upgrade of the Deephams Sewage Treatment Works (STW), a facility with a population equivalent four times larger than Cambridge, reduced its land footprint by one-third and eliminated 99% of odour while remaining fully operational on-site.

Furthermore, the existing CWWTP site layout contains extensive areas of redundant, disused plant, specifically disused Streams A and C (as identified in Odournet 2020 and site layouts). This demonstrates that substantial land-freeing footprint reductions can be achieved on the existing site. By failing to consider an improved, modern, enclosed, and space-efficient facility, and failing to carry over the feasibility requirements of Adopted Policy SS/4, the Councils lack the proportionate evidence required to justify these restrictive "stay out" zones. The Policy misses the opportunity to encourage consolidation and odour reduction so as to maximise the effective use of brownfield land for housing and commercial development.

Summary (<100 words):
Policy S/AMC/NEC is unjustified under NPPF Paragraph 32. The Councils have dismissed on-site consolidation and limited housing delivery by relying on the 2018 Odournet study, which only modelled the existing open-air plant. They have failed to carry over the feasibility requirements of Adopted 2018 Policy SS/4. Save Honey Hill's evidence to the DCO Public Inquiry (REP1-171) proves that modern upgrades, such as Deephams STW, can reduce footprints by a third and eliminate 99% of odour. The Plan lacks the proportionate evidence required to dismiss this sustainable on-site alternative and should instead promote consolidation and odour reduction at CWWTP

Change Requested:
Amend Policy S/AMC/NEC to carry over formally the requirement of Adopted 2018 Policy SS/4 to

commission and publish a fresh, independent, and comprehensive feasibility study. This study must model the physical consolidation of the CWWTP on its current site utilizing modern enclosure technology, advanced odour scrubbers, and space-efficient wastewater treatment processes, demonstrating achievable footprint reduction and odour reduction in order to maximise effective use of brownfield land released at the CWWTP site for housing and commercial use, while preserving Green Belt.

The policy should focus on a plan-led approach to the sustainable intensification of existing employment sites and explore the delivery of mixed-use development, including new housing opportunities enabled by modern in-situ odour mitigation and footprint consolidation of the CWWTP

6) Policy S/AMC/NEC (Criterion 10 / Para 10) & Minerals and Waste Policy 16

Target Policy/Section: Policy S/AMC/NEC (Criterion 10 and Supporting Paragraph 10) & Minerals and Waste Local Plan (MWLP) Policy 16
Status: Object – Unsound (Inconsistent with National Policy / Ineffective)

Main Response:
Policy S/AMC/NEC is unsound because its approach to odour management is internally inconsistent, ineffective, and conflicts with Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) 2021. Policy S/AMC/NEC (Criterion 10 and Supporting Paragraph 10) treats the existing Waste Water Treatment Safeguarding Area as a de facto "stay out zone" or "exclusion zone," stating that residential development is "unlikely to be suitable" within the 3 unit odour contour. This directly overrides MWLP Policy 16, which defines the safeguarded area as a **"Consultation Area" (CA)** where development **will be permitted** provided it is demonstrated that the proposed use will not result in unacceptable amenity issues.

Furthermore, the Plan is unclear as to the application of the "Agent of Change" principle (NPPF Paragraph 193) Supporting paragraph 10 requires individual, fragmented downstream residential developers to bear the sole burden of mitigating odour. Because South Cambridgeshire District Council, Cambridge City Council, and Anglian Water Services are joint landowners and coordinated promoters of this strategic site, the mitigation of odour must be addressed through a coordinated, plan-led framework. Expecting individual parcel developers to manage odour from a major open-air municipal plant is completely unviable. To comply with MWLP Policy 16 and NPPF Paragraph 193, the policy must mandate a plan-led, co-funded program to enclose and mitigate odour at source at the existing facility, unlocking 35 hectares of strategic brownfield land for housing.

Summary (<100 words):
Policy S/AMC/NEC is inconsistent with MWLP Policy 16 and ineffective under NPPF Paragraph 193. It treats the odour contour as an "exclusion zone" rather than a "Consultation Area" where development is permitted with suitable mitigation. By misapplying the Agent of Change principle to place the unviable burden of odour mitigation on individual incoming parcel developers, the Plan blocks 35 hectares of brownfield land. Soundness requires S/AMC/NEC to mandate a plan-led, co-funded programme of odour reduction at source at the existing plant.

Change Requested:
Amend Policy S/AMC/NEC (Criterion 10 and Supporting Paragraph 10) to remove the presumption that residential use is "unsuitable" within the safeguarded Consultation Area. Replace this with a plan-led policy requirement that mandates the joint planning authorities and Anglian Water Services to deliver a coordinated, co-funded programme of odour reduction and selective enclosure **at source** at the existing CWWTP, ensuring compliance with MWLP Policy 16 and the core principles of NPPF Paragraph 193.

12) Waterbeach Wastewater Strategy & Water Cycle Study Evidence

Status: Object – Unsound (Not Justified by Proportionate Evidence)
Target Policy/Section: Waterbeach New Town Infrastructure Strategy, the October 2025 Greater Cambridge Detailed Water Cycle Study, and the July 2026 Detailed Water Cycle Study Wastewater Addendum

Main Response:
The wastewater treatment strategy for Waterbeach New Town is unsound because it is unjustified by up-to-date, proportionate evidence, contravening Paragraph 31 of the National Planning Policy Framework (NPPF). The October 2025 Greater Cambridge Detailed Water Cycle Study (WCS) and the July 2026 Wastewater Addendum continue to default to a strategy where wastewater from 11,000 homes is pumped via a 5km pipeline to Cambridge, treating this pumping main as a predetermined necessity [2.5.2]. This strategy is justified in paragraphs 2.2.6 and 2.2.7 of Anglian Water Services' CWWTPR DCO Planning Statement [REP1-049] by claiming that Cambridgeshire County Council "made it clear" that a local Water Recycling Centre (WRC) was not feasible, and that the Environment Agency (EA) advised that pumping was the "only feasible and deliverable option" [2.2.6]. However, these assertions do not align with the actual regulatory and pre-application records.

The actual Cambridgeshire County Council pre-application response (PR/S/5113/19/CW, dated 5 September 2019) shows that officers did not reject a local WRC on absolute technical grounds. Instead, they stated that Anglian Water Services' submission was "lacking in detail," failed to demonstrate a "robust methodology" or a sequential test, and was therefore "unclear" if the site could be supported "upon the basis of the limited information provided" [PR/S/5113/19/CW, Page 7]. Furthermore, County Council and EA communications reveal that Anglian Water Services sought an inordinately large land take of 15 to 20 hectares for a modest 30,000 population equivalent (PE) facility, a footprint size that was considered unjustified and created an artificial barrier to a local, sustainable WRC [33, 1.4.8]. The EA explicitly clarified in February 2019 that while they welcomed the pipeline as a "fall-back" option, they did not hold the developer or Anglian Water Services to that option. Pumping was selected as a default simply because the relevant parties neglected to produce the robust sequential testing and detailed technical Environmental Impact Assessment (EIA) for the local plant.

This failure to progress a local solution directly contradicts the 2014 Denny St Francis (now Waterbeach New Town) Water Cycle Study (WCS). This was a comprehensive, 244-page multi-disciplinary study commissioned by RLW Estates Ltd and conducted by Mott MacDonald

(subsequently also commissioned by Anglian Water Services to produce many of its own CWWTPR DCO technical assessments). Unanimously endorsed by South Cambridgeshire District Council, Cambridgeshire County Council, the Environment Agency (EA), and Anglian Water Services, this study concluded that a new local WRC was the "most sustainable option" because it would "negate the requirement of considerable carbon and pumping costs of a transfer to Cambridge WRC".

Under the current Proposed Submission Plan, in the absence of the CWWTP relocation following the withdrawal of the Housing Infrastructure Fund (HIF) grant, the chosen strategy is to pump Waterbeach wastewater permanently to the existing open-air CWWTP WRC [2.5.2]. The CWWTPR Examining Authority's (ExA) Report (12 July 2024) recommended that the Secretary of State refuse development consent for the relocation project. While the Secretary of State subsequently approved the DCO based on a high probability of housing delivery, the subsequent withdrawal of the HIF grant means the "Very Special Circumstances" (VSC) that overrode the Green Belt harm have collapsed [181, 2.57]. It is therefore highly questionable to assume that a pipeline designed to serve an operationally unnecessary relocation, which was recommended for refusal by the independent planning inspectors, and which is now unfunded and highly unlikely to happen remains a valid or justified solution.

In its representations to the draft regulation 18 Local Plan, Anglian Water is understood to have raised concerns regarding the capacity of the existing open CWWTP, which questions further the logic of pumping waste 5km uphill to a plant that Anglian Water has said to be capacity limited. Multiple reference sites exist that demonstrate modern well screened treatment facilities, in close proximity to housing, that have either been purpose built or consolidated on a compact footprint, many of which, due to the requirement to be near to a water source, are purposely designed to operate in a flood zone.

While Anglian Water Services has statutory pipe-laying powers under the Water Industry Act 1991, these operational powers do not excuse the joint planning authorities from their statutory duties under the NPPF to ensure that strategic infrastructure is justified by a robust, completed, and transparent assessment of sustainable alternatives. Defaulting to a permanent long-distance pumping main imposes an ongoing, energy-intensive pumping burden and carbon cost that has never been transparently appraised against a modern, enclosed, local Water Recycling Centre, ensuring that a high-carbon pumping pipeline is not accepted as a default outcome without a complete, evidence-based assessment of alternatives.

Summary (<100 words):
The Waterbeach wastewater strategy is unjustified under NPPF Paragraph 31. The pipeline default relies on a misleading account of regulatory advice, bypassing the comprehensive 2014 Denny St Francis (now Waterbeach New Town) 244-page WCS conducted by Mott MacDonald and endorsed by the relevant stakeholders, which concluded a local plant was the "most sustainable option" avoiding significant pumping costs to a 'capacity limited' facility. Anglian Water's statutory pipe-laying powers should not excuse the Councils from sequentially testing sustainable alternatives. Committing to a permanent pumping main linked to a relocation recommended for refusal by the Examining Authority is unjustified and unsustainable.

Change Requested:
Amend the Waterbeach New Town Infrastructure Strategy, Policy S/WNT, and the Detailed Water

Cycle Study to remove the default requirement for a 5km pipeline transfer to Cambridge. The joint planning authorities must commission a fresh, independent, and comprehensive feasibility assessment of wastewater options for Waterbeach. This assessment must objectively evaluate the long-term carbon, capital, and operational costs of a local, low-carbon Water Recycling Centre (utilizing modern, space-efficient, and enclosed treatment technologies) versus the permanent 5km pumping-main strategy to the existing CWWTP, ensuring the most sustainable outcome is selected based on a complete technical fact-base rather than a default pumping main.

13) Waterbeach Infrastructure & Carbon (NPPF 152 / MWLP Policy 1)

Status: Object – Unsound (Not Justified and Inconsistent with National Policy)
Target Policy/Section: Waterbeach New Town Infrastructure Strategy, the October 2025 Greater Cambridge Detailed Water Cycle Study, the July 2026 Wastewater Addendum, and the Policies Map

Main Response:
The wastewater treatment strategy for Waterbeach New Town is unsound because it is unjustified and inconsistent with national policy, contravening Paragraph 152 of the National Planning Policy Framework (NPPF) regarding reductions in greenhouse gas emissions and Policy 1 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) 2021. Paragraph 2.2.7 of Anglian Water Services' CWWTPR DCO Planning Statement [REP1-049] asserts that the pipeline to Cambridge brings "operational efficiencies, capital cost efficiencies and carbon emissions reductions" compared to a local plant [2.2.7]. However, this claim directly conflicts with the 2014 Denny St Francis (now Waterbeach New Town) Water Cycle Study (WCS), a comprehensive 244-page report commissioned by RLW Estates Ltd and conducted by Mott MacDonald (subsequently commissioned by Anglian Water Services to produce many of its own CWWTPR DCO technical assessments). Unanimously endorsed by South Cambridgeshire District Council, Cambridgeshire County Council, the Environment Agency, and Anglian Water Services, this study concluded that a new local WRC was the "most sustainable option" because it would "negate the requirement of considerable carbon and pumping costs of a transfer to Cambridge WRC".

This pipeline strategy introduces a highly unsustainable, dual-track risk depending on the outcome of the CWWTP relocation:

1. **If the relocation to Honey Hill proceeds:** The made CWWTPR DCO confirms that the southern section of the Waterbeach pipeline (Work No. 36) is designed to be redundant and decommissioned as soon as the relocated plant is operational [7.4.8]. Proposing the construction of multi-million-pound "throwaway" infrastructure intended for immediate destruction represents an indefensible waste of embedded carbon, materials, and capital, violating MWLP Policy 1. This is particularly so given that it is highly unlikely that funding will ever be available for the relocation of the CWWTP so the housing will not be built which was the sole reason why the Secretary of State over-rode the recommendation of the CWWTPR Examining Authority's recommendation to refuse development consent for the relocation project. So the entire justification for this redundant, carbon-intensive infrastructure remains fundamentally flawed.

2. **If the relocation does not proceed:** The pipeline remains a permanent, high-carbon, energy-intensive pumping main conveying wastewater 5km to the existing open-air CWWTP [2.5.2]. Pumping permanently over this distance represents an ongoing operational carbon and energy penalty that is not justified by the evidence.

While Anglian Water Services has statutory pipe-laying powers under the Water Industry Act 1991, these operational powers do not excuse the joint planning authorities from their planning duties under the NPPF to ensure that strategic infrastructure is justified by a robust, completed, and transparent assessment of sustainable alternatives. Defaulting to a pipeline without a complete, transparent assessment of the long-term whole-life carbon costs of permanent pumping to Cambridge versus a local, enclosed treatment facility fails to ensure a sustainable development strategy. To meet soundness and climate change obligations under NPPF Paragraph 152, the Local Plan must not accept this pipeline as a default outcome without a transparent, evidence-based appraisal of alternatives.

Summary (<100 words):
The Waterbeach wastewater strategy is unjustified under National Planning Policy Framework (NPPF) Paragraph 152 and Minerals and Waste Local Plan (MWLP) Policy 1. It ignores the comprehensive 2014 Denny St Francis (now Waterbeach New Town) 244-page Water Cycle Study (WCS) by Mott MacDonald and approved by the relevant stakeholders, which concluded a local plant was the most sustainable option to avoid massive pumping and carbon costs. To meet soundness and climate change obligations under NPPF Paragraph 152, the Local Plan must not accept this pipeline as a default outcome without a transparent, evidence-based appraisal of alternatives.

Change Requested:
Amend Policy S/WNT and Policy CC/IW to require a comprehensive, independent assessment of the long-term whole-life carbon and operational energy costs of the pipeline transfer strategy (including permanent pumping to the existing CWWTP) versus a local, low-carbon, modern, enclosed wastewater treatment facility. The policy must state that no final wastewater strategy for Waterbeach New Town will be approved unless it is demonstrated to be the most sustainable, lowest-carbon long-term option in accordance with the carbon reduction mandates of NPPF Paragraph 152 and MWLP Policy 1.

18) Policy I/SI & Policies Map – Support for the Omission of Relocation Safeguarding

Status: Support – *Sound (Justified and Consistent with the Development Plan)*

Target Policy/Section: Policy I/SI (Safeguarding important infrastructure), Supporting Paragraph 10.59, and the Policies Map

Main Response: We strongly support Policy I/SI and the associated Policies Map as drafted because they **correctly omit** any infrastructure safeguarding or Consultation Area designations for the proposed Cambridge Waste Water Treatment Plant Relocation (CWWTPR) site at Honey Hill.

In its Regulation 18/19 representations, Anglian Water Services has requested that the joint planning authorities amend Policy I/SI to safeguard the Honey Hill site. We consider that the Councils'

decision to refuse this request is entirely sound, justified, and consistent with the wider statutory development plan framework for the following reasons:

1. **Absence of Operational Need:** Infrastructure safeguarding under Policy I/SI is designed to protect essential infrastructure with a proven operational or national need. Both the Examining Authority's Report and the Secretary of State's CWWTPR DCO Decision Letter (6 June 2025) legally confirmed that there is **no operational need** or environmental requirement to relocate the existing plant; the relocation is a highly discretionary "facilitating act" to enable housing. Since the withdrawal of the Housing Infrastructure Fund (HIF) grant has made that housing delivery "uncertain" [2.57, 175], sterilising 94.0 hectares of Green Belt land within the DCO Order Limits through a speculative local safeguarding policy would be unjustified.

2. **Redundancy and Existing Safeguarding:** As explicitly identified in **Supporting Paragraph 10.59**, the Local Plan must be read in conjunction with the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) 2021. Under **MWLP Policy 16**, the existing CWWTP is already fully safeguarded. Because the region's operational wastewater infrastructure capacity is already statutorily protected, safeguarding a second, duplicate 94.0-hectare site in the Green Belt for an unfunded, discretionary project is unnecessary and would introduce duplicate and conflicting safeguarding policies across the Development Plan.

Summary (<100 words): We strongly support the omission of any safeguarding designations for the Honey Hill relocation site under **Policy I/SI** and the Policies Map. As confirmed by the Secretary of State, the relocation has no operational necessity, and the associated housing is now "uncertain" following the withdrawal of the HIF grant [2.57]. Furthermore, as directed by **Paragraph 10.59**, the existing CWWTP is already fully safeguarded under **MWLP Policy 16**. Safeguarding a second 94.0-hectare Green Belt site for a discretionary, unfunded project would be redundant and would create an inconsistent policy framework.

Change Requested (Supportive Comment): Maintain Policy I/SI, Supporting Paragraph 10.59, and the Policies Map as proposed, and formally **refuse** Anglian Water Services' request to safeguard the CWWTP relocation site at Honey Hill. This will ensure the Plan remains internally consistent, avoids redundant double-safeguarding, and protects the Green Belt in accordance with NPPF Chapter 13.

20) Policy S/AMC/NEC: Support for Retention of CWWTP In-Situ

Target Policy/Section: Policy S/AMC/NEC & Spatial Strategy for the Cambridge Urban Area (Paragraphs 2.56 to 2.59)
Status: Support – Sound (Justified / Consistent with National Policy)

Main Response:
We strongly support the designation of North East Cambridge as an Area of Major Change that retains the CWWTP in situ under Policy S/AMC/NEC [2.56]. This approach is justified and consistent with national policy, representing the most sustainable spatial choice for Greater Cambridge. Retaining the plant in situ avoids the "significant adverse effect" of generating 53,010 tonnes of

construction carbon [ES Chapter 10] and protects 34 hectares of permanent Green Belt land (94.0 hectares within the total DCO Order Limits) at Honey Hill, which the made DCO confirms would cause certain harm to openness.

Retaining the plant acknowledges the Examining Authority's finding that there is no operational necessity for relocation. This policy shift aligns with NPPF Paragraph 152 regarding radical carbon reduction and NPPF Paragraph 147 by avoiding inappropriate Green Belt development when a sustainable, functional alternative exists on brownfield land.

Summary (<100 words):
We support Policy S/AMC/NEC for retaining the CWWTP in situ. This strategy is justified as it avoids 53,010 tonnes of avoidable construction carbon and protects 94.0 hectares of Green Belt within the DCO Order Limits at Honey Hill. Since the Secretary of State and Examining Authority confirmed there is no operational necessity to move the plant, retaining it is the most sustainable spatial choice. It complies with NPPF para 152 and protects the Green Belt from inappropriate development.

21) Policy S/JH (Jobs and Homes) & Housing Trajectory Headroom Support

Target Policy/Section: Policy S/JH (supporting housing trajectory)

Status: Support – Sound (Effective / Justified)

Main Response:
We strongly support the housing trajectory evidenced in Policy S/JH and its supporting Development Strategy Topic Paper (2026), which demonstrates that Greater Cambridge's housing needs can be fully met within the plan period with only 425 homes on the NEC site [2.57]. The Plan identifies 6.5% housing supply headroom above the objectively assessed need and confirms there are no 'exceptional circumstances' for Green Belt release for housing anywhere around Cambridge, proving that the relocation of the CWWTP is not required as part of a sound Local Plan.

Summary (<100 words):
We support Policy S/JH and the evidence that housing needs are met with 6.5% headroom with only 425 homes on the NEC site, and without Green Belt release. This proves the CWWTP relocation is not required as part of a sound Local Plan.

22) Policy CC/IW (Wastewater) & Developer Capacity Accountability

Target Policy/Section: Policy CC/IW (Criterion 6(a) / Supporting Text)
Status: Object/Comment – Unsound (Ineffective)

Main Response:
We object to Anglian Water's Regulation 18/19 request to delete Criterion 6(a) of Policy CC/IW, which requires developers to demonstrate wastewater capacity prior to occupation. AW seeks to

shift this responsibility entirely to its own statutory duties. This would reduce the transparency and effectiveness of the planning system.

Developers must remain responsible for demonstrating that their specific proposals—particularly large-scale sites like Waterbeach or NEC—will not result in environmental detriment due to capacity lags. The wastewater lifecycle planning for Waterbeach New Town, from the original 2014 Water Cycle Study to the current day WCS 2025 / WCS 2026 pipeline proposal, provides clear documentary evidence of what can happen when the process breaks down. Consequently, developers must remain responsible for proving capacity exists before occupation to prevent major environmental or SSSI harm.

AW's suggestion, having asserted on an ongoing basis that it does not need to relocate for operational needs, that it is now facing “capacity constraints” that have been “exacerbated by the withdrawal of funding”, makes it even more critical that the Plan maintains the requirement for site-specific capacity evidence before development proceeds.

Summary (<100 words):
We object to AW’s request to remove developer responsibility for demonstrating wastewater capacity. Shifting this entirely to statutory duties is ineffective. The wastewater lifecycle planning for Waterbeach, from the 2014 WCS to the current pipeline proposal, provides clear documentary evidence of what happens when the planning process breaks down. Given AW’s suggestion of current capacity constraints, it is essential that developers remain responsible for proving capacity exists before occupation to prevent environmental and SSSI harm.

Change Requested:
Retain Criterion 6(a) in Policy CC/IW as proposed, ensuring developers remain responsible for demonstrating that sufficient wastewater capacity exists before development is occupied, in accordance with the Effectiveness test (NPPF 36c) [36c].

23) Policy S/DS (Development Strategy) & Countryside Utility Exception Refusal

Target Policy/Section: Policy S/DS (and Policy S/GB) & Response to Anglian Water
Status: Object – Unsound (Inconsistent with National Policy)

Main Response:
We object to Anglian Water’s request to amend the Plan to include a policy "positively supporting" the delivery of essential utilities infrastructure in the countryside/Green Belt. While the intention of the proposal may be for minor works, this could create a local presumption in favour of above ground infrastructure works in the Green Belt which would conflict with the strict “Very Special Circumstances” test required by NPPF Paragraph 147 and the requirement to demonstrate that no other suitable sites are available.

AW's suggestion that it is now facing capacity constraints cannot be used to weaken countryside protections.

Summary (<100 words):
We object to AW's request for a policy that "positively supports" utilities in the countryside. While the intention of the proposal may be for minor works, this could create a conflict with the strict Green Belt tests in NPPF Chapter 13. AW's suggestion that it is now facing capacity constraints, cannot justify weakening countryside protections. Proposing a local policy presumption for utilities would undermine Green Belt protection and bypass sequential testing of sustainable in-situ alternatives.

Change Requested:
Maintain the existing restrictive policy approach to development in the countryside and Green Belt under Policy S/DS and Policy S/GB, ensuring any utility infrastructure proposal continues to meet the highest threshold of national policy tests .

24) Spatial Strategy, Policy S/AMC/NEC, & Evidence Base – Residual Transitional Inconsistencies

Target Policy/Section: Spatial Strategy for the Cambridge Urban Area (Paragraphs 2.56 to 2.59), Policy S/AMC/NEC, the July 2026 Sustainability Appraisal, the July 2026 Site Allocations Topic Paper, and the July 2026 Detailed Water Cycle Study Wastewater Addendum.
Status: Object – Unsound (Internally Inconsistent and Ineffective)

Main Response:
The Proposed Submission Local Plan is unsound because it contains residual policy and technical contradictions regarding the CWWTP left over from the transitional shift from a relocation-dependent strategy to the current "in-situ" baseline under Policy S/AMC/NEC. These are confusing. The Plan also refers to the "preferred vision" of future relocation which is incorrect and misleading – there is no adopted 'preferred vision'. In the interests of arriving at a robust and consistent plan, these conflicting and misleading elements must be resolved to satisfy the Justified (NPPF 36b) and Effective (NPPF 36c) soundness tests [36b, 36c].

While the Plan correctly adapts to the August 2025 Housing Infrastructure Fund (HIF) withdrawal by assuming an in-situ CWWTP under Policy S/AMC/NEC, several key supporting documents and technical models continue to refer to the "preferred vision" of future relocation:

1. **Policy Fallback (Para 2.58):** The draft Plan text explicitly retains the relocation as an active strategic contingency, stating the Councils *"would seek to deliver the previous preferred vision... should funding again become available"* but without the necessary plan content addressing this contingency.

2. **Site Allocations Topic Paper (Para 2.10):** Paragraph 2.10 explicitly states that the Waste Water Safeguarding Area restrictions will remain *"unless there is a significant change in circumstances around the funding prospects for the CWWTP relocation project."* This treats the in-situ designation as a temporary placeholder rather than a permanent planning baseline.

3. **Water Cycle Study (WCS) Wastewater Addendum (July 2026):** Section 5.8.1 continues to model the river water quality benefits of the *relocated* plant's ultra-low phosphorous permit

to justify the Plan's overall environmental performance. This prompted the Environment Agency (EA) in Comment EA5 to object, stating they were *"unclear as to why the reference to the proposed new WWTW has been left in... given that the funding for the relocation has been withdrawn."*

4. **Sustainability Appraisal (SA) Option Structure (July 2026):** The SA treats options assuming an in-situ plant (e.g., 9b and 10b) merely as "variants" of the default relocation options, carrying forward the Green Belt relocation as the preferred strategic benchmark.

The presence of this 'dual-track' confusion is openly conceded in Paragraph 2.58, which states that the Councils are deferring a 'refined position' to a 'later plan-making stage'. This is a procedural error. Under NPPF Paragraph 15, local plans must provide a clear, positive framework and certainty. Publishing a Proposed Submission Plan that contains residual, contradictory relocation assumptions, and admitting in the text that a cohesive strategy has not yet been refined, conflicts with the NPPF requirements. The joint planning authorities cannot defer soundness to a later stage; the Plan must be justified and effective now. In accordance with SCDC and CCC's own December 2023 Local Impact Report (Paragraph 6.104), which warns that a plan dependent on an undeliverable allocation *"would ultimately not be found sound,"* the joint planning authorities must resolve these transitional conflicts to ensure a single, clear, and deliverable strategic pathway.

Summary (<100 words):
The Plan is unsound because of unresolved technical contradictions between the new "in-situ" CWWTP policy and residual relocation elements. The July 2026 WCS Addendum still models the relocated plant's water quality benefits—drawing a formal objection from the Environment Agency (Comment EA5)—while the Site Allocations Topic Paper (Para 2.10) treats the in-situ option as a temporary contingency. This contradicts the Councils' own deliverability test in their December 2023 Local Impact Report (Paragraph 6.104). The Councils must resolve these transitional conflicts to ensure a robust plan.

Change Requested:
Amend the Spatial Strategy for the Cambridge Urban Area, Policy S/AMC/NEC, and the supporting evidence base to resolve these transitional contradictions. The Councils must formally delete all fallback references to future relocation (including Paragraph 2.58 and Site Allocations Paragraph 2.10). The Sustainability Appraisal and Water Cycle Study Wastewater Addendum must be updated to remove all water quality, carbon, and spatial assumptions that depend on a relocated plant, establishing a true, independent "in-situ" baseline.

25) Policy S/GB: The Cambridge Green Belt

Target Policy/Section: Policy S/GB: The Cambridge Green Belt (para 2.137)
Status: Object – Unsound (neither justified nor consistent with national policy)

Main Response:
25.1 FDPC supports in principle Policy S/GB: The Cambridge Green Belt. However, para 2.137 of the supporting information states that *"The Cambridge Green Belt Assessment (2021) and the Cambridge Green Belt Assessment Review following changes to National Policy and Guidance (2026)*

assess the contribution of different parcels of land to these purposes and identify grey belt land to inform plan making…".

25.2 There is an issue with the methodological approach that has been taken by the 2026 Green Belt Assessment ('GBA').

25.3 The starting point is that the GBA has attempted to continue the approach taken in the 2021 Greater Cambridge Green Belt Assessment (GCGBA) and simply 'refresh it' to take account of the new concept of Grey Belt. There are several issues with this.

25.4 The first is that the GCGBA followed the historic pattern of focusing on the three historic Cambridge Purposes (Purpose 1, 2 and 3) rather than the five purposes of the NPPF. It is appreciated that this approach has previously been tolerated, but it is no longer fit for purpose when faced with the new definition of Grey Belt.

25.5 This is because the definition of Grey Belt – inherently central for identifying Grey Belt – requires that land does not contribute strongly to any of '*of purposes (a), (b), or (d)*'. There is therefore a need for assessments to look at each purpose individually because even if land didn't contribute strongly to two out of the three purposes, if it contributed strongly to the third then it would not be Grey Belt. There is an inherent need to therefore assess each purpose individually.

25.6 However the 2026 GBA has not done this but instead – as is made clear between 3.14 – has only considered whether parcels contribute strongly to Purpose D. Not only does that fail to recognise their own findings – see Table 3.1 at page 44 of GCGBA - that Cambridge Purpose 1 aligns with NPPF purpose (a), and Cambridge Purpose 3 aligns with NPPF purpose (b), but it is fundamentally inconsistent with national policy which requires grey belt be identified by examining all three purposes.

25.7 Fundamentally this first issue means that the 2026 GBA does not actually identify Grey Belt. It simply identifies land which does not strongly contribute to purpose (d). But that is not Grey Belt and there is a real concern that if this document is relied upon at local plan stage to establish – even provisionally – grey belt then it will be relied upon as such in the future. Even though it has not examined the other two relevant purposes.

25.8 On this issue alone the evidence is unjustified.

25.9 The second issue is that – by attempting to carry across findings from the 2021 GCGBA – the GBA has mistranslated its own findings.

25.10 This is a point of particular concern with the areas of Grey Belt for Fen Ditton (FD3 and FD7). Both these Sites were classified as 'moderate-high' in the 2021 GCGBA.

25.11 The 2026 GBA makes clear at 5.5 that it equates those sites which were found to be 'moderate-high' harm rated parcels in the 2021 GCGBA to having only a moderate contribution to Purpose D given they do not make a 'considerable' contribution (relying on the PPG).

25.12 However this fails to engage with the findings of the 2021 GCGBA. We will use FD3 as an example.

25.13 The starting point is the definition for the various levels of 'harm' rating in the 2021 GCGBA. This is provided at Table 3.6 on page 105. "Moderate-high' harm is defined as one of two things:

> *Release of land results in a loss of strong contribution to one of the Green Belt purposes, but would constitute a negligible impact on adjacent Green Belt land;*
>
> *or Release of land results in a loss of relatively limited contribution to one of the Green Belt purposes, and would constitute a moderate impact on adjacent Green Belt land.*

25.14 So – on the terms of this definition – the relevant question for the 2026 GBA is which of those categories the land falls into. If it is the first part of the definition (strong contribution to purposes but negligible impact on adjoining land) then it is not Grey Belt. If it is the second part (limited contribution but moderate impact on adjoining) then it could be said to be Grey Belt.

25.15 The point is the 'rating' system in the 2021 GCGBA took into account impact on adjacent land – which is not relevant to the Grey Belt definition.

25.16 In terms of Parcel FD3, it is found to have had a 'Relatively Significant' contribution to Cambridge Purpose 2 (which equates to NPPF Purpose D). However, it only makes a limited impact on contribution of adjacent Green Belt. This is captured by the site specific assessment summary:

> *Parcel FD3 makes a relatively significant contribution to maintaining and enhancing the quality of Cambridge's setting and a relatively limited contribution to preserving Cambridge's compact character. The additional impact on the adjacent Green Belt of the release of the parcel would be minor. Therefore, the harm resulting from its release, as an expansion of Fen Ditton, would be moderate high.*

25.17 It therefore falls into the moderate-high definition because while it makes a strong contribution to Purpose D, it would only have a limited impact on adjoining Green Belt.

25.18 The critical point being the element of the 'moderate-high' definition that is relevant to Grey Belt is that it was found in the 2021 GCGBA to make a strong contribution to Cambridge Purpose 2 (and thus NPPF Purpose D). But – and this is where the error lies – because the 2026 GBA has not recognised the role that 'impact of adjoining Green Belt' has played in the 2021 'Moderate-High' rating it has been wrongly classified as provisional Grey Belt.

25.19 It can be noted in this regard that the other parcels assessed as a 'Relatively Significant' contribution to Purpose 2 in the 2021 GCGBA – FD1, FD4, FD5, FD6 – have all been considered in 2026 GBA to not be Grey Belt.

25.20 This is an error that would not have occurred had LUC done what was required, and carried out a fresh assessment against the relevant Green Belt purposes for determining the Grey Belt definition. They have not done so and attempted to rely on translating over findings from the 2021 GCGBA. But that has been done in a manner which is not justified.

25.21 The issue for the Examination is that this assessment is being relied upon to provisionally define Grey Belt going forward. This could have significant development ramifications. But it has been done in an unjustified way which fails to properly define Grey Belt.

25.22 The Examination cannot conclude that the Plan's approach to Grey Belt is 'sound' because the key evidence base (the 2026 GBA) is neither justified nor consistent with national policy. It has – quite simply – failed to properly apply the definition of Grey Belt by only focusing on one purpose (D) and compounded the error by mistranslating over findings from the 2021 GCGBA.

25.23 Furthermore para 2.137 is inconsistent with Figure B.19 of the latter document shows 2 areas, FD3 and FD7, which are described as "*Provisional Grey Belt - Moderate contribution to purpose D*" and Topic Paper Appendix 4: Revised Greater Cambridge Local Plan Green Belt which states in para 4.1 *"…assessment to identify land that could provisionally be considered grey belt…*". The absence of the term provisional in para 2.137 is very important because the 2026 document above is erroneous or misleading in that:

1) On page 26, CWWTPR is listed as a new extant permission but the Red Line boundary shown on Figure 4.10 is in error because it does not match the approved LOCATION AND SCHEME ORDER LIMITS PLAN REGULATION 5(2)(o)00001-100006-CAMEST-ZZZ-LAY-Z-9816 REVC02.
2) Figure B.19 shows an area labelled FD3 which includes the village Recreation Ground and Cemetery and part of the Fen Ditton Conservation Area.

25.24 Greater Cambridge Green Belt Assessment Response to comments from Site Submissions Update and Draft Local Plan Consultation contains responses to comments on both FD3 and FD7 which indicate that neither can be considered grey belt in their entirety.

Summary (<100 words):

The Plan is unsound because the key evidence base (the 2026 GBA) is neither justified nor consistent with national policy. It has – quite simply – failed to properly apply the definition of Grey Belt by only focusing on one purpose (D) and compounded the error by mistranslating over findings from the 2021 GCGBA.

Change Requested:

1. That a further Grey Belt Assessment is carried out to align with national policy and provided a justified basis. Or failing that,
2. That the Local Plan makes it explicit in para 2.137 that the 2026 GBA should carry little weight in any future decision as to definitive classification as grey belt or that the inclusion of FD3 and FD7 as provisional grey belt in the Plan should equally carry little weight.
3. That para 2.137 is reworded to include the phrase "provisionally identify"