



REPRESENTATION

Draft North East Cambridge Area Action Plan

Prepared by Strutt & Parker on behalf of Gonville & Caius College

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1. BACKGROUND & INTRODUCTION

Background

- 1.1 This Consultation Response has been prepared by Strutt & Parker on behalf of Gonville & Caius College (The College) in respect of the Greater Cambridge Shared Planning Service consultation on the Draft North-East Cambridge Area Action Plan (AAP).
- 1.2 The AAP includes proposals that require the existing Cambridge Wastes Water Treatment Works (CWWTP) to be relocated from its existing site in Cowley Road. Anglian Water have already shortlisted three potential relocation sites in the Cambridge Green Belt, one of which includes land at Rectory Farm, Milton which is owned by The College.

Introduction

- 1.3 The College recognises the locational importance of the AAP and its links the economic importance of delivering the East-West rail project which will connect to North-East Cambridge, at the new Cambridge North Station. They also recognised that this part of Cambridge has the capacity to bring forward new homes and jobs to meet the future needs of Greater Cambridge and they support these aspirations.
- 1.4 It is also recognised that the area is an important transport gateway into Cambridge from the north, along the A10 corridor and A14 via the Milton Interchange, the Guided Busway, and rail services to and from Cambridge North Station. This general gateway area is also subject to a number of other potential future improvements, including the proposed dualling of the A10, the Cambridge Autonomous Metro Project, and a number of Greenway projects which will improve active travel routes into the City from Milton, Waterbeach and beyond. The AAP will need to take account of all these potential new transport improvements which will have significant economic, social and environmental benefits not only in, but beyond the AAP area. These projects and the AAP represent a real opportunity for significant improvements to the North-East Area of Cambridge, the aspirations of which, The College wholeheartedly support.
- 1.5 However, the College does not support the inclusion in the AAP of the proposal to relocation the CWWTP to a new site in the Green Belt and wishes to raise strong objection to this part of the AAP.
- 1.6 In summary The College's objections relate to:
 - The Planning Policy Basis of the AAP;
 - The impact on the Cambridge Green Belt; and,
 - The justification for the relocation of the CWWTP.
- 1.7 More detail of these objections is set out below.

2. THE CONSULTATION

- 2.1 In respect of the specific questions raised in the consultation, the content of these representations generally has most relevance to Question 1: What do you think about our vision for North-East Cambridge? However, there will be some natural overlap with other questions given the College's objections to the relocation of the CWWTP. This includes Question 3 in respect of the location of new centres, and also Question 4 in respect of the right balance between new jobs and new homes.

3. PLANNING POLICY BASIS

3.1 The Draft North-East Area Action Plan area falls predominantly within the administrative area of Cambridge City Council and is on the boundary with South Cambridge District Council.

3.2 The Development Plan for this area includes:

- The Cambridge Local Plan and Adopted Policies Map 2018;
- The Cambridgeshire and Peterborough Minerals and Waste Core Strategy 2011; and
- The Minerals and Waste Site Specific Proposals Plan and Proposals Maps 2012.

3.3 For South Cambridgeshire District Council the local plan is the:

- South Cambridgeshire Local Plan Adopted September 2018.

3.4 Paragraph 15 of the National Planning Policy Framework 2019 (NPPF) states that:

“The planning system should be genuinely plan led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

3.5 The National Planning Practice Guide states:

“The development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.” (Paragraph: 026 Reference ID: 61-026-20180913).

3.6 The Government is committed to the plan led system and this is enshrined in the policy guidance above.

3.7 The development plan is required to contain strategic policies to address the local planning authority’s priorities for development and use of land within its area, the currently adopted development plans for Greater Cambridge do just this.

3.8 Non-strategic policies can be included in local plans to set out more detailed policies for specific areas, neighbourhoods or types of development which can be included by way of site allocations.

- 3.9 Development Plan policies, both strategic and non-strategic can then be expanded upon through Development Plan Documents and Supplementary Planning Documents. The Town & Country Planning (Local Planning) (England) Regulations 2012, require that any policies contained in a supplementary planning document must not be in conflict with the adopted development plan. Accordingly, it is considered that the North-East Cambridge Area Action Plan should follow this requirement and not conflict with the strategic policies in the adopted local plans which it seeks to update and eventually replace.
- 3.10 AAP consultation at section 2.1.6 Planning Context; refers to the adopted 2018 Local Plans for Cambridge City and South Cambridgeshire District Council. These adopted plans form the policy basis for development of the AAP.
- 3.11 The AAP area crosses the administrative boundaries of both Cambridge City Council and South Cambridgeshire District Council. The Councils now have a shared planning service which covers both administrative areas and is known as Great Cambridge Shared Planning Service which is now developing the AAP.
- 3.12 The AAP area lies predominantly within the administrative area of Cambridge City Council as does the CWWTP. Policy 15 of the adopted 2018 City Local Plan relates to the AAP area and is set out below:

“Policy 15: Cambridge Northern Fringe East and new railway station Area of Major Change

The Cambridge Northern Fringe East and the new railway station will enable the creation of a revitalised, employment focussed area centred on a new transport interchange.

The area, shown on the Policies Map, and illustrated in Figure 3.3, is allocated for high quality mixed-use development, primarily for employment uses such as B1, B2 and B8, as well as a range of supporting commercial, retail, leisure and residential uses (subject to acceptable environmental conditions).

The amount of development, site capacity, viability, timescales and phasing of development will be established through the preparation of an Area Action Plan (AAP) for the site. The AAP will be developed jointly between Cambridge City Council and South Cambridgeshire District Council, and will involve close collaborative working with Cambridgeshire County Council, Anglian Water and other stakeholders in the area. The final boundaries of land that the joint AAP will consider will be determined by the AAP.

All proposals should:

- a. take into account existing site conditions and environmental and safety constraints;*
- b. demonstrate that environmental and health impacts (including odour) from the Cambridge Water Recycling Centre can be acceptably mitigated for occupants;*
- c. ensure that appropriate access and linkages, including for pedestrians and cyclists, are planned for in a high quality and comprehensive manner;*
- d. recognise the existing local nature reserve at Bramblefields, the protected hedgerow on the east side of Cowley Road which is a City Wildlife Site, the First Public Drain, which is a wildlife corridor, and other ecological features, and where development is*

proposed, provide for appropriate ecological mitigation, compensation and enhancement measures either on- or off-site; and

e. *ensure that due consideration has been given to safeguarding the appropriate future development of the wider site.”*

3.13 This policy and the supporting text is similarly replicated the South Cambridge District Council (SCDC) adopted Local Plan as Policy SS/4: Cambridge Northern Fringe East and Cambridge North railway station.

3.14 Fundamentally, Policy 15 (and Policy SS/4) do not require the relocation of the CWWTP, they actually presuppose the continued use of the current location as they require that all proposals should:

b. *“Demonstrate that environmental and health impacts (including odour) from the Cambridge Water Recycling Centre can be acceptably mitigated for occupants;”*

3.15 Consequently, from a planning perspective at the present time there is no adopted policy requirement to support the need to relocate the existing CWWTP and most notably, none that would justify ‘very special circumstances’ for a Green Belt location. Nor is there any policy support for the levels of housing development which are now proposed in the AAP.

3.16 The supporting text to the Policy at paragraph 3.35 does however indicate that:

“Exploration in respect of the viability and feasibility of redevelopment of the Cambridge Water Recycling Centre to provide a new treatment works facility either elsewhere or on the current site, subject to its scale will be undertaken as part of the feasibility investigations in drawing up the AAP. If a reduced footprint were to be achieved on the current site, this could release valuable land to enable a wider range of uses. Residential development could be an option, subject to appropriate ground conditions, contamination issues and amenity and air quality.”

3.17 Section 2.1.6 Planning Context of the AAP consultation simply states feasibility studies are now complete and relocation off-site is the option moving forward.

3.18 It is unclear from the present consultation the extent of feasibility and viability investigations which have been undertaken other than the fact that a successful Housing Infrastructure Fund (HIF) bid has been secured which doesn’t necessarily mean that relocation is the most sustainable, environmentally correct or viable option for the CWWTP site.

3.19 It may be true that these feasibility studies have been completed, however, it is unclear what matters they took into account. Clearly, it is feasible to relocate a waste water treatment works, however, the extent of the environmental consequences of doing so in this case cannot have been properly assessed. Nor can the planning consequences of a relocated plant having to be developed in the Green Belt have been taken into consideration when Anglian Water are yet to identify a suitable relocation site, and also in the circumstances where their current site selection process is considered to be flawed.

3.20 As set out above, the current planning policy context clearly does not require the relocation of the CWWTP. Neither does it require the significant levels of housing development which are now being proposed in the draft AAP.

- 3.21 The strategic policies of the adopted Local Plans seek to deliver sufficient housing and employment land to meet the City and District's needs over the plan period 2011 to 2031. Whilst it is noted that the Government's objective is to significantly boost the supply of housing (NPPF para 59) it is also committed to the plan led approach (NPPF para 15). The respective strategies of both adopted plans do not rely on housing delivery at North-East Cambridge to meet the City and District's objectively assessed needs.
- 3.22 The City Council Local Plan Policy 2: Spatial Strategy for the Location of Employment Development; identifies:
- 3.23 *"The Council's aim is to ensure sufficient land is available to allow the forecast of 22,100 new jobs in Cambridge by 2031."*
- 3.24 The Policy does make reference to the contribution that the North-East Cambridge AAP area may make to this objective.
- 3.25 However, notably, Policy 3: Spatial Strategy for the Location of Residential Development; states:
- "Provision will be made for the development of not less than 14,000 additional dwellings within Cambridge City Council's administrative boundary over the period from April 2011 to March 2031 to meet the objectively assessed need for homes in Cambridge. This will enable continuous delivery of housing for at least 15 years from the anticipated date of adoption of this local plan."*
- 3.26 In respect of Policy 3, there is no reference to the AAP area making any contribution towards housing delivery to meet the Council's objectively assessed need for the plan period.
- 3.27 Accordingly, the current adopted planning strategy does not require the delivery of any significant amounts of additional housing, and most certainly not at the level being proposed, to meet the objectively assessed needs of the Greater Cambridge area. Accordingly, this does not suggest that there is any essential need for the CWWTP to be relocated in order to make way for the scale of residential development proposed in the draft AAP and as such cannot be considered to represent the 'very special circumstances' necessary justify relocation to a site in the Green Belt.
- 3.28 Currently, the Greater Cambridge planning authority are developing a new combined Local Plan. It is this plan which should identify the most appropriate planning strategy for the delivery of such significant levels of housing to meet the future housing needs of the Local Plan area beyond 2031.
- 3.29 The AAP suggests that it could deliver 8,000 new homes if the CWWTP is relocated. This is a significant amount of new residential development, at a scale that was clearly not envisaged in the currently adopted local plan policies which identify the area primarily for employment uses such as B1, B2 and B8. Whilst the policies allow for a mix of uses including retail, commercial, leisure and residential, they clearly do not support residential development of the scale proposed. It should be noted that this scale of residential development is similar to that of Waterbeach New Town. This would clearly be a strategic

scale of development, significantly different in character to that envisaged by the current adopted policies, and as such, if it is to be pursued, it should be planned for through the strategic policies of the new emerging Local Plan, not an area action plan.

- 3.30 It is worth noting that in respect of the Examination of the South Cambridgeshire adopted Local Plan (August 2018) the joint Inspector's Report noted at paragraph 21:

"The Plan proposes that development needs will be met at two new settlements at Waterbeach and Bourn Airfield. We have some concerns regarding the challenges of delivering new development at Waterbeach and Bourn..."

- 3.31 It is also worth noting that in respect of the Uttlesford Local Plan, the Inspector (paragraph 114 of Inspector's letter to the Council dated 10th January 2020) expressed concerns about the Council's reliance on new garden communities and concluded that:

"In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5-year HLS, until the Garden Communities begin to deliver housing. This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing..."

- 3.32 The Uttlesford Local Plan was subsequently withdrawn. Similar concerns were also recently raised in respect of the Braintree District Council emerging local plan and its over reliance on new settlements.

- 3.33 Clearly, introducing yet another area of significant new housing at a similar scale to the new settlements of Waterbeach and Bourn Airfield (and those proposed in Uttlesford and Braintree) will also bring with it challenges to delivery, not least those associated with the uncertainties around the need to relocate the CWWTP through the Development Consent Order process to a new Green Belt location. Developing an AAP which relies on such a relocation will in itself delay the plan making process and bring with it a significant degree of uncertainty.

- 3.34 As such, at the present time it must be concluded there is no adopted policy basis which supports the relocation of CWWTP simply to make way for the scale of residential development proposed by the draft North-East Cambridge AAP. In addition, ahead of a review of the adopted local plans the draft AAP may also be considered to be in conflict with adopted policies of the Development Plan.

- 3.35 In conclusion, it is the College's view that the CWWTP should be retained on its existing site and consolidated to avoid the delays and uncertainty around its relocation. This approach would mean the delivery of the important regeneration objectives of the AAP, which the College supports, could be brought forward more quickly. Whilst such a strategy would reduce the scale of residential development deliverable, the regeneration of the area could be brought forward in line with the currently adopted policy basis for the area and not delay the progress of the emerging Local Plan.

4. IMPACT ON THE GREEN BELT

- 4.1 Anglian Water recently consulted on the Cambridge Waste Water Treatment Plant Relocation project, which indicated that the proposed relocation is to be funded by the Government's Housing Infrastructure Fund (HIF) grant of £227m. It should be noted that this is the second largest HIF award in the country and accordingly, any decision around how it is spent should be based on robust evidence that proposals will deliver significant social, economic and environmental benefits along with value for money. Anglian Water indicate that without the HIF grant they would not be able to fund their relocation, therefore their statutory duty to deliver waste water treatment capacity would have to be delivered by way of an expansion/upgrade of the existing Cowley Road site funded by themselves. The relocation project is classed as a Nationally Significant Infrastructure Project (NSIP). Anglian Water, therefore, has to submit a Development Consent Order (DCO) application to the Planning Inspectorate rather than the County Council as Waste Planning Authority.
- 4.2 Anglian Water has identified three potential relocation sites, one of which will impact on the College's land. It is suggested that within one of these sites, the area required would be around half the size of the existing AWA site at Cowley Road, Cambridge at approximately 22 ha, still a significant area of development for a Green Belt location.
- 4.3 All three of their preferred sites are located on the northern side of the A14 in the Cambridge Green Belt. Furthermore, because of the site assessment requirement that sites are located at least 400m away from residential areas, this means that they are not on the edge of any parts of the Green Belt but inset within it which will automatically compromise the Green Belt's openness.
- 4.4 Paragraph 133 of the NPPF confirms that the Government attaches great importance to Green Belts and that:
- "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*
- 4.5 The Cambridge Green Belt was established in 1965, since then it has been subject to a number of strategic reviews, the most recent of which were the Inner Green Belt reviews in 2012 and 2015. As a consequence, the remaining established Green Belt is unlikely to undergo any significant changes in the future unless there is a change to national Green Belt policy.
- 4.6 The SCDC Local Plan identifies that the Green Belt surrounding Cambridge is relatively small extending 3 to 5 miles from the edge of the city. At paragraph 2.30 the Local Plan indicates that the established purposes of the Cambridge Green Belt are to:
- *"Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;*
 - *Maintain and enhance the quality of its setting; and*

- *Prevent communities in the environs of Cambridge from merging into one another and with the city.”*
- 4.7 Paragraph 2.31 goes on to identify a number of factors which define the special character of Cambridge and its setting, including:
- *“Key views of Cambridge from the surrounding countryside;*
 - *A soft green edge to the city;*
 - *A distinctive urban edge;*
 - *Green corridors penetrating into the city;*
 - *Designated sites and other features contributing positively to the character of the landscape setting;*
 - *The distribution, physical separation, setting, scale and character of Green Belt villages; and*
 - *A landscape that retains a strong rural character.”*
- 4.8 Policy S/4 of the SCDC Local Plan states new development will only be approved in the Cambridge Green Belt where it accords with Green Belt policy in the NPPF.
- 4.9 Given the above, it is unlikely that there will be any fundamental revision to the established Green Belt boundaries around Cambridge through the next local plan review which may result in any of the three identified locations being removed from the Green Belt. The NPPF is clear that any amendment to Green Belt boundaries proposed by a strategic planning authority will have to demonstrate that “exceptional circumstances exist” and should only come forward where the policy-making authority has demonstrated that it has examined fully all other reasonable options for meeting its identified development needs.
- 4.10 As a review of the relevant Green Belt areas associated with the three preferred sites is extremely unlikely, if Anglian Water is to bring any of them forward through the DCO process, the DCO examiner/s will have to consider the proposals against paragraphs 143 to 147 of the NPPF. On this basis, the development of a new CWWTP will be “inappropriate development” by definition and “very special circumstances” will have to be demonstrated which outweigh the harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal. As stated above, at the present time, the delivery of housing which would be realised through the relocation is not required to meet the objective needs of the adopted local plans. Furthermore, in the event that such levels of residential development were needed, in the absence of a review of the local plans, it will not be possible to demonstrate that all other reasonable options have been fully explored to justify development in the Green Belt.
- 4.11 Additionally, to demonstrate that “very special circumstances” do exist, Anglian Water will have to evidence that it has considered all the alternative options for the provision of waste water treatment to meet the requirements of the area. From the evidence submitted in support of their consultation, Anglian Water has already confirmed that the relocation of

the plant is not an operational necessity. It must therefore be concluded that there is no overriding need for a new plant to encroach into the Green Belt.

- 4.12 The AAP must have regard to the consequential impact of requiring the CWWTP relocation on the Cambridge Green Belt and it is clear that “very special circumstances” do not exist to justify this, as such, the delivery of the AAP and its soundness must be questioned.

5. JUSTIFICATION FOR THE RELOCATION OF THE CWWTP

5.1 In 2014/2015, a £21m upgrade to Anglian Water's CWWTP was reported not only to have future-proofed the site to serve residents for decades to come, but also secured its standing as the eastern region's green energy generating giant. This was reported to have halved embodied carbon and to be a good step towards Anglian Water's goal to be a net zero carbon business by 2030. It seems surprising following this investment that Anglian Water is now seeking to relocate to a new site especially when the embedded carbon load of relocation and rebuilding will be colossal.

5.2 The Cambridgeshire and Peterborough adopted Minerals and Waste Local Plan and the currently emerging Minerals and Waste Local Plan, do not identify a need to relocate the CWWTP or seek to identify any suitable sites for such relocation.

5.3 As part of their relocation project Anglian Water undertook Initial Options Appraisal and Paragraph 2.1.6 of the Initial Options Appraisal seems to be the only explanation for the requirement for relocation. It states:

2.1.6 *"Although it would be technically feasible to consolidate the existing treatment assets and occupy a smaller area of the existing site, this is not **desirable** [emphasis added] for the following reasons:*

- *The application for funding from the HIF, including the business case, is predicated on moving the whole WWTP to enable regeneration of the entire site. A partial release of land would not provide a sufficient business case to justify the HIF funding, as it would not be possible to deliver the number of residential properties required.*
- *Anglian Water's Asset Encroachment Policy 9 is used to minimise the potential risk to proposed developments in proximity to existing WWTPs, primarily in relation to odour impacts. The assessment methodology states that developments within 400m of a treatment plant serving more than 50,000 people would encounter a high risk of potential impacts. If the WWTP was consolidated, much of the remaining area available for development would be within 400m of the plant (like the existing WWTP, a consolidated WWTP would be designed to serve a population in excess of 50,000 people). Therefore, consolidation of the existing WWTP and development of the remaining area would present a potential risk to the amenity of the development and could constrain Anglian Water's ability to operate its plant efficiently.*
- *In addition, the local waste planning strategy stipulates that a new WWTP within 400m of properties normally occupied by people would require an odour assessment demonstrating that the proposal is acceptable, together with appropriate mitigation measures."*

2.1.7 *"For these reasons, no options have been identified in this study that retain any waste water treatment capacity on the existing site."*

5.4 In paragraph 2.1.6, the use of the word "desirable" is an interesting choice. One might reasonably expect the decision to be based on "not the most environmentally sustainable option" or similar reasoning rather than just desirable. The use of the word "desirable"

suggests this is a preferred option as it will deliver a new, more efficient facility (desirable?) which will be self-funded through the HIF grant at no cost to the business. The whole relocation project appears to be predicated on the fact that the HIF money is available to relocate the CWWTP, however, as set out above, the planning policy basis for this does not exist. As such, the AAP should be reviewed to retain, upgrade and consolidate the existing CWWTP on its existing site. The AAP should not be pursuing the use of the HIF monies at all costs, rather it should review the business case behind the original grant application and in the public interest seek to renegotiate the funding to support a more environmentally beneficial scheme which does not require the relocation of the CWWTP to a Green Belt location.

- 5.5 It is noted that the existing CWWTP provides two functions, firstly, the treatment of Cambridge City and surrounding areas used water and secondly, the treatment of solids removed during the water treatment process on site and those received from smaller WWTP. Consideration should be given to the separation of these two functions which could result in some activities being redirected to alternative locations. For example, retaining the water treatment process on the existing site and relocating the solids treatment would allow a considerable consolidation of operations on the existing site, reduce vehicle movements and allow a larger area for redevelopment. A new solids treatment plant would also be easier to locate beyond the Green Belt as it would not require the same extent of pipelines and tunnels.
- 5.6 As part of the sustainability appraisal, the North-East Cambridge AAP will have to undertake a full assessment of the environmental, economic and social need for development, along with benefits/dis-benefits, and associated cost benefits and value for money, of relocating the CWWTP compared to consolidating operations on the existing site. It is not reasonable to rely on a statement which simply states feasibility studies are now complete and relocation off-site is the option moving forward (Section 2.1.6 Planning Context of the AAP consultation).

6 CONCLUSIONS

- 6.1 While The College supports Greater Cambridge's aspirations for the regeneration of North-East Cambridge proposed by the AAP, it wishes to raise strong objection to the relocation of the CWWTP. It does not consider there is any policy justification for the CWWTP to be relocated in order to deliver the scale of housing development currently proposed in the AAP. Nor does it consider that the AAP is the appropriate mechanism to deliver such a strategic scale of development which should be brought forward through the emerging local plan, where all alternative options can be fully considered.
- 6.2 Anglian Water has confirmed that there is no operational necessity to relocate and it is technically feasible to consolidate the existing treatment assets and occupy a smaller area of the existing site. However, they suggest this is not 'desirable'. The College is concerned that the AAP and relocation project are not based on sound justification, simply that Anglian Water and the City Council will be able to redevelop their existing sites at Cowley Road for housing, and that the construction of a new, more modern facility, for the CWWTP in a Green Belt location, will be funded by the HIF grant.
- 6.3 As set out above, there is currently no adopted planning policy justification or requirement for CWWTP to be relocated to the Green Belt to deliver the scale of housing development proposed in the AAP. There does not appear to have been any rigorous assessment of the environmental impacts, cost benefits and value for money for including the relocation, compared to the consolidation of existing operations on site.
- 6.4 In addition, there has been a lack of proper consideration of the consequences of the relocation which will require a significant new facility to be developed in the Cambridge Green Belt. 'Very special circumstances' do not exist for such a Green Belt development and there has been a failure to demonstrate that all reasonable alternatives have been properly considered at this stage.
- 6.5 Accordingly, while the College supports the principles of the AAP, it considers that it should be amended to allow the CWWTP to be consolidated and retained on its existing site. This is clearly the most sustainable option. There is an absence of a demonstrable need for the level of development proposed by the AAP to justify the Relocation of the CWWTP. The relocation will also delay the progression of the AAP and potentially the emerging Local Plan, and there is a significant lack of certainty that a DCO will be approved. Furthermore, there are clear environmental dis-benefits associated with relocation, not only the development of a new 22 ha CWWTP on a Green Belt site in open countryside, but also the extensive tunnels and pipeline corridors which will be required. Therefore, the inclusion of relocation of the CWWTP in AAP is not considered to be a sustainable way forward, and the AAP should be amended to remove this requirement accordingly.