

**Reference: WW010003**  
**Contact: Claire Shannon**  
[REDACTED]@greatercambridgeplanning.org

31.01.2025

Water Infrastructure Planning & Delivery Unit  
Department for Environment, Food and Rural Affairs  
Seacole Building  
2 Marsham Street  
London  
SW1P 4DF  
[CambridgeWWTPR@planninginspectorate.gov.uk](mailto:CambridgeWWTPR@planninginspectorate.gov.uk)  
**Electronic submission only**

Dear Sir / Madam

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

**Introduction**

1. Cambridge City Council, herein referred to as 'CCC', acknowledges the publication of the letter dated 20 January 2025, inviting further representations on the revised National Planning Policy Framework (NPPF), adopted on 12 December 2024, specifically regarding national policies on housebuilding and green belt relevance to the Cambridge Waste Water Treatment Plant Relocation Project ("the Application"), submitted by Anglian Water.
2. CCC had previously responded in respect of proposed revisions to the NPPF, on 13 November 2024, addressing their relevance to housebuilding and green belt policies as they relate to the Application.

**National Planning Policy Framework (2024)**

3. The December 2024 publication of the NPPF makes clear the government's clear expectation for the Planning System and local plans to support the delivery of new homes and to underpin sustainable economic growth for the Country. The corresponding calculations for Cambridge City and South Cambridgeshire District Councils' housing need, using the revised housing need methodology serve to increase the combined annual housing target for the area from 1,726 to 2,309 homes per annum across the area.

4. The North East Cambridge (NEC) area has already been identified through the adopted Local Plans (2018)<sup>1</sup> as an area suitable for employment led development. The potential relocation of the waste water treatment plant significantly increases the potential contribution that the site and surrounding area, which is currently constrained by odour contours, can make towards meeting the area's increased housing and employment needs. This has been articulated in the emerging Area Action Plan and the emerging Joint Local Plan<sup>2</sup> as having potential for 8,350 homes and 15,000 additional jobs. CCC accordingly maintains its earlier position regarding these matters and reiterates the following key points from its previous submissions, noting specific elements of the adopted NPPF (2024) relevant to this Application:

#### Nationally Significant Infrastructure Projects

5. The adopted National Planning Policy Framework (NPPF) does not contain specific policies for the determination of nationally significant infrastructure projects (NSIPs). These projects are assessed in accordance with the decision-making framework established under the Planning Act 2008 (as amended), relevant national policy statements for major infrastructure, and any other material considerations, which may include the NPPF. The adoption of the updated NPPF does not alter the established approach to NSIPs, which remains consistent with prior practice.

#### Green Belt

6. CCC's position on the Green Belt remains unchanged under the adopted NPPF, including in relation to paragraph 155 that introduces a new designation of 'grey belt', having regard to the Council's published Green Belt evidence on the significance of land around Cambridge to the purposes of the Cambridge Green Belt.
7. CCC maintains the view that the significant benefits arising from relocation of the existing waste water treatment plant (WWTP) collectively amount to very special circumstances.
8. Ultimately, it is for the Secretary of State to evaluate and weigh these benefits against the identified Green Belt harm resulting from the development's inappropriateness and any other adverse impacts.

#### Brownfield Land and Sustainable Development

9. The adopted NPPF reinforces prioritisation of previously developed land in sustainable locations. CCC has consistently supported this focus on the effective re-use of this major

---

<sup>1</sup> Cambridge City Local Plan (2018) and South Cambridgeshire District Local Plan (2018)

<sup>2</sup> Emerging Greater Cambridge Local Plan

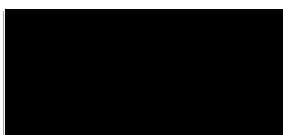
brownfield land within the urban area of Cambridge, in particular while contributing to local infrastructure and housing needs.

10. The efficient redevelopment of the existing Cambridge Waste Water Treatment Plant site, together with the surrounding land that relocation releases, would make a substantial contribution to meeting the housing and employment needs identified by the Local Planning Authority through its emerging Development Plan is in the view of the Council consistent with the NPPF's focus on optimising land already in use, particularly where it supports housing and other identified needs (paragraph 125(c)).

### **Conclusion**

11. The Council's in-principle support for the DCO remains unchanged, recognising the significant benefits enabled by relocating the Cambridge Waste Water Treatment Plant and unlocking the development potential of underutilised and previously developed land within the urban area of Cambridge, both the existing waste water treatment plant (WWTP) site itself and the surrounding area that is constrained by odour contours.
12. The adopted NPPF and revised standard method housing need calculation that accompanies the NPPF make clear Government's expectation that a greater number of new homes should be provided to meet the national housing objective of government. This reinforces the significance of the role the existing WWTW site and the surrounding area in North East Cambridge can play as a key part of the development strategy in the emerging joint local plan and also to Government's focus on continued growth in the Cambridge area, subject to the relocation of the WWTP.
13. CCC believes that the adopted NPPF's clear emphasis on prioritising the efficient redevelopment of brownfield land as part of realising the national priority for sustainable housing and economic growth, and for balancing green belt protection with the realisation of those national priorities, coupled with the specific national focus on Cambridge's growth and its significant contribution to the UK economy, provides an updated and material context for the Secretary of State's consideration of the proposals.

Yours faithfully



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