



Karen Barclay
Head of Regional Engagement
Anglian Water Services
Cambridge Water Recycling Centre
Cowley Road
Milton
Cambridge
CB4 0AP
14th Sept 2020

President
Christopher Vane Percy
Branch Chair
Alan James
Branch Vice-Chair
Lawrence Wragg

Re: Anglian Water Relocation of Milton Waste Water Treatment Works Consultation

Dear Mrs Barclay

CPRE Cambridge and Peterborough objects to the proposal to relocate Milton Waste Water Treatment Works (WWTW) to any of sites 1,2 and 3 for the following reasons:

1. Anglian Water concur that there is no operational need to move the Milton WWTW from the current site. The current works have been upgraded to serve the area's needs until 2050 and are currently at c. 50% capacity.
2. CPRE object to Anglian Water's shortlisted sites 1, 2 and 3 because all are sited in the Cambridge Greenbelt.
3. The National Planning Policy Framework (NPPF) Section 13, indicates the obligation to protect Greenbelt land. Para 137, states *"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:"*

a) "makes as much use as possible of suitable brownfield sites and underutilised land"

This statement alone makes the case not to relocate the WWTW because it has been demonstrated that a modern WWTW utilising latest technology could be built on the existing Anglian Water site.

4. The size and scale of the proposed plant will be intrusive on sites 1, 2 and 3. The purpose of the Cambridge Greenbelt is to prevent urban sprawl into the surrounding countryside. The Greenbelt was also designed to maintain the sense of place of Cambridge City as well as the identities of the necklace of villages around the city, characteristic of the South Cambridgeshire District.
5. NPPF Para 133, states: *"The Government attaches great importance to Green Belts. 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."*
6. NPPF Para 134, states: *"Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up area b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*
7. Greenbelt Policy S/4 of the South Cambridgeshire District Council (SCDC) adopted Local Plan 2018 Chapter 2 Spatial Strategy states as follows:

"Cambridge Green Belt. A Green Belt will be maintained around Cambridge that will define the extent of the urban area. The detailed boundaries of the Green Belt in South Cambridgeshire are defined on the Policies Map, which includes some minor revisions to the inner boundary of the Green Belt around Cambridge and to the boundaries around some inset villages. New development in the Green Belt will only

be approved in accordance with Green Belt policy in the National Planning Policy Framework paragraphs 31 and 32.” This Policy S/4 provides further evidence of the importance maintaining the Cambridge Greenbelt.

8. The Cambridge City adopted Local Plan Spatial Strategy Policy 4, Cambridge Greenbelt, paragraphs 2.51 - 2.58 reflect SCDC’s Greenbelt Policy S/4.
9. CPRE have obtained records and maps from the Cambridgeshire and Peterborough Environmental Records Centre. The maps show important areas pertaining to County wildlife sites, areas of SSSI and recorded sightings of wildlife across sites 1, 2 and 3. It is unclear if Anglian Water are aware of these records. CPRE would like to suggest that perhaps the records could be obtained to further inform their studies when considering sites 1, 2 and 3.
10. The Honey Hill site falls within the National Trust’s iconic Wicken Fen Vision. Wicken Fen is a designated Site of Special Scientific Interest. It is a National Nature Reserve and a Nature Conservation Review site. It is also a designated RAMSAR wetland site of international importance and part of the Fenland Special Area of Conservation under the Habitats Directive. The Wicken Fen Vision is to extend the site from Wicken to Cambridge. The Vision is an important initiative to protect the fenland countryside and biodiversity and to provide a place for people to access for recreation and leisure. CPRE believe this to be of major local and national importance. This importance has grown in the light of lifestyle changes for many due to COVID 19. Another factor is the push for economic growth and housing in the Cambridge City and South Cambridgeshire area where green, informal, space is at a premium.
11. Much of the Greenbelt land within the proposed sites is Grade 2 and 3a, best and most versatile, agricultural land. This factor appears to not to have been a consideration in shortlisting sites 1, 2 or 3. Significant weight is given to protecting such land from development by the NPPF, paragraphs 170 and 171, note 53.
12. CPRE note that new haul roads will need to be constructed to enable access to the proposed sites during the construction and operational phase. These will remove more land from the Cambridge Green Belt and result in HGV and tanker traffic to service the site. This will cause additional environmental damage to the surrounding countryside. This is another reason for the existing works to remain where they are.
13. There is the potential for noise, dust, light pollution, odour and vibration in the Cambridge Green Belt and tranquil areas in the landscape adjoining sites 1, 2 and 3. Although a 400m buffer is proposed this is a “policy” and does not “organically” measure the true effect on either the environment or nearby communities.
14. CPRE note that the Site Selection Technical Study 6 Stage 3 Final Screening Assessment para 6.4.2 states: *“Affordability – The CWWTPR project will be funded by a grant from the HIF to facilitate the regeneration of the existing WWTP site. Without the HIF funding the relocation would not be feasible. The funding is finite, and it would not be possible to exceed it. If relocating to one of the potential site areas would cost more than is available from the grant then the project would no longer be feasible at that site area.”*

CPRE questions that if the HIF funding of £227m is finite, it could be perceived that the choice of site could be made on cost alone. Knowing how regular it is that major infrastructure projects significantly exceed budget, CPRE is extremely concerned to know how will this project be completed if it does go over budget and the funding need does exceed the available HIF funding.

In Summary:

After careful consideration, CPRE believe that the Cambridge WWTF should remain on the existing site at Milton where there is room for a smaller, modernised facility, using new technology to be implemented. This is a least cost, least risk option.

CPRE objects to the location of sites 1, 2 and 3 as proposed in the Cambridge Green Belt and the resulting loss of best and most versatile farmland, harm to the environment and harm to existing communities.

CPRE objects to the removal of further land from the Cambridge Green Belt for new roads to support the proposed sites and the intrusion of HGVs and tankers into the surrounding Green Belt countryside.

CPRE is concerned that the tranquillity of the surrounding fenland landscape will be unduly harmed by light pollution, noise, odour, dust and vibration caused by the construction and operation of a new WWTF and the vehicles required to service it.

CPRE is concerned by the affordability of the relocation of Milton sewage works and that the £227m HIF awarded by Homes England is finite and that the choice of site may be decided through economic pressure. There is also a clear risk to the completion of the project and to its resulting quality if the available funds are exceeded by unexpected circumstances or under-budgeting.

CPRE also note that the £227m is a loan not a grant which will need to be repaid. This could affect the viability of the proposed Cambridge North Eastern Fringe development in which Anglian Water would have a direct interest.

Yours sincerely

Jane Williams
On behalf of CPRE Cambridgeshire and Peterborough