

2nd September 2020

Re-locating Anglian Water Sewage Works

Dear Lucy Frazer MP,

I am writing on behalf of Histon & Impington Parish Council and our residents. Our community is considerably the largest community affected by the possible siting of the STW. We have significant concerns over the proposed process for selecting the site. We are fully aware of the requirements of the 2008 Planning Act and that this moving of the STW is part of a National Infrastructure Project: even if on its own it might fall below the threshold for a STW under the 2008 Act. Even within the prescribed process for such projects we have issues concerning the public interest which need raising and, more importantly, resolving at this stage.

We appreciate that wherever is chosen as the site (either within the three now shortlisted or any alternatives North East of Cambridge) will be within your constituency and therefore you of necessity will need to be equal handed in the considerations of the site selection between your various constituents. The issues we raise refer whichever site is selected by AWA. However, we thank you for organising the Zoom session on Wednesday 12th for village representatives to raise issues with AWA and will welcome the opportunity to participate further in the proposed village by village sessions which you are proposing with AWA during the remaining consultation period. As we note below, some interesting matters arose in that conversation.

The Zoom session confirmed to us that the site selection will be made entirely by AWA. They shortlisted the current set of three potential sites using qualitative criteria (which they have not fully revealed) and used their judgement of the relative importance of the criteria, and again have not revealed how they arrived at their judgements. This sets a poor precedent for the coming decision on a single site.

We have serious concerns about the thoroughness and responsiveness of their short listing process.

All three sites are in the Green Belt, despite National and local Planning Policy to preserve the Green Belt whenever practical. On one site that was not in the Green Belt (H) they commented cost ruled out its inclusion: such a choice is contrary to public policy. Not having a single option site outside the Green Belt is indicative of AWA choosing for their benefit not the public good.

The potential site 3 was originally excluded from the final short list for consultation on the grounds that it was in the flight path of Cambridge airport. SCDC pointed out the airport was due to close and become a major housing development. That AWA and their planning

advisers were unaware of this plan which is common public knowledge greatly reduces our confidence in the competence of the AWA team.

We have had further concerns raised by the presentations of AWA and their answers on the Zoom session.

They have not published definitive criteria for the selection and we could find the announcement of the selected site compounded with post hoc justifications.

We have been advised that given this is a project with important public impacts, on amenity and on economic development, that the lack of public oversight of the selection criteria to be used by AWA is a dereliction/ a failure of authority/ a failure of a duty to care by the public bodies.

They clearly indicate that odour for them is not a selection criterion as they believe it will not be an issue. This despite the current works, updated in 2015 and using modern technology does have a significant odour issue and their drawing the 400m circles from all habitation to reduce the odour impact. Their confidence is shallow: they have not yet chosen a technology to use (as they said in request for a site visit to confirm their odour assumptions) and they admit that the site will be built with a limited total budget: problems arising in the early civil engineering works could result in a cheaper processing technology being substituted which may not be so odour friendly.

The AWA representative on your call stated clearly that elsewhere in England the required distance is 600m, Cambridgeshire County Council having shortened the distance from the national 600m to 400m in the Minerals and Waste Strategy policy. The reason for the County Council choosing 400m is clearly stated in the Planning Inspector's report on the Minerals and Waste Strategy. He notes that it is set with reference to a policy for the siting of small sludge treatment facilities as part of an agricultural business. He accepts the adoption on the basis that no large scale STW (for which a longer distance would clearly be required) is envisaged.

If AWA is of a mind to deny an issue that does exist and then use an inappropriate criterion will mean a choice made on erroneous and incomplete consideration.

We have already noted their cavalier ignoring of National Planning Policy. On the call they did say they were "trying to work with Greater Cambridge Planning to take into account proposed developments coming forward in the development of the Local Plan". Given their track record this is a disappointingly weak commitment. The Local Plan for the Greater Cambridge Area (City and SCDC combined area) consultation has suggested nibbling into the Green Belt close to the City boundaries in order to provide housing, and importantly employment opportunities, within easy travel distance of the many new residents of the expanding Cambridge City. This proposal received considerable support from the public consultation. We are aware of (albeit still confidential) proposal and there may well be others that proposes considerable much needed employment opportunities close to the City Boundary. The extra and diverse employment is required both to meet the aspirations for local development but also more importantly to fulfil the expectations of central government economic planning for the significant local GDP enhancement, especially in the post Brexit situation. All of which are considerations that outside the interest of AWA who are to make the selection choice on their own.

Hence, we are concerned that AWA alone, a commercial body driven as it must be by its shareholders requirements, is making the selection of site unchecked.

However if the site selection would be subject to proper public scrutiny, our concerns could be mitigated. We were pleased that in the Zoom meeting you did concur that proper public scrutiny was required. We note that the proposed process includes no possibility for that to happen.

The AWA representatives rightly referred to the current consultation as an "informal" consultation and it is not part of the application process for obtaining the DCO.

That process starts with a "defined project". AWA admitted that this is not a defined project until they have made the site selection. From then on over a two year time frame they will prepare the necessary evidence for the proceeding with the project and undertake the required Section 42 and 47 consultations in the run up to the submission to the Secretary of State for the initial examination by the Planning Inspector. The DCO decision will be yes/no on the evidence for the selected site only. The current consultation is slated to be outside the process for applying for a DCO.

For this STW relocation there are two significant issues:

This will be a planning application and like all planning applications there is key central rule. That is the consideration is only on the application and the proposal submitted. We find that this is serious drawback when we as a council acting as statutory consultee on local applications find difficult for new members to work within. Not being able to say "this would be so much better if...." is not an option. Nor will it be so for the Planning Inspector who will be constrained to only consider the application as submitted.

Even if it were possible at that time to question the choice of site, there would be an understandable response from the promoters that now two years has elapsed based on the selected site that to reconsider for a different site would incur extra cost and more importantly delay the project by two years and thus delay the building of the extra houses so desperately needed (and promised).

We are convinced, and you concurred on the Zoom meeting, that a public scrutiny of the choice at the time of selection is important:

- To ensure all public benefits are properly considered
- That public money is spent for public good not enhancing shareholder value
- To gain public confidence in the selection, crucial given the errors already made by AWA in the site selection, their own commercial imperatives and biases they have demonstrated.

As the elected representative of all the residents affected by this process, we look to you ensure that it is properly undertaken in both the public and your residents' best interests.

Yours Sincerely,

Denis Payne, Chair
Histon & Impington Parish Council