

Cambridge Waste Water Treatment Plant  
Relocation Project

Formal response  
on behalf of  
Histon & Impington Parish Council

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## Summary

Histon and Impington Parish Council (HIPC) strongly object to sites 1 & 2 and believe that site 3 is the only appropriate selection of those presented.

Furthermore, we have significant concerns and objections to the processes applied to date.

### Principles, policies and processes

#### *Sustainable development*

Section 2 paragraph 7 of the NPPF states that:-

*The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.*

The paragraph refers to Resolution 42/187 of the United Nations General Assembly. This resolution defines “sustainable” according to three criteria:

1. Environmentally sustainable
2. Economically sustainable, and
3. Socially (especially in terms of community values) sustainable

HIPC holds that Sites 1 and 2 fail on both of the last two criteria.

#### *Joined up planning*

Multiple plans are currently underway:

1. NECAAP - where there is a tight relationship with the relocation of the waste water treatment plant;
2. The Greater Cambridge Local Plan - with the “call for sites” material is due for imminent publication (16<sup>th</sup> September);
3. Transport planning for access to/from Waterbeach New Town

The plant relocation planning should be **integrated** with all of these, **not** cut across them.

#### *Site Selection*

AWA have chosen not to share their decision criteria for selecting the site. If the numbers of people potentially affected by the proximity of the proposed waste water plant is critical, there is clearly an obviously preferred site. If this were a decision by a public body, this criterion would be one of the foremost, and as this project is being totally funded by public money, it should be key in this decision.

### *Policy Conflict*

Furthermore HIPC is concerned that AWA have been placed in an unenviable position. One government body has, by its level of funding, inevitably limited the choice of sites to those in the Green Belt. This is against the policy of another arm of government requiring the preservation of the Green Belt and not permitting development on the basis of cost. HIPC would encourage and publicly support AWA if it were to use the weight of all the objections against these Green Belt sites to lobby for government to adopt a self-consistent approach and fund the movement of the works appropriately.

### *Transparency & Scrutiny*

HIPC are deeply concerned about the use of unclear qualitative selection criteria, where the lack of joined up planning has introduced errors, the failure to adhere to national policies (eg cost is not an acceptable justification to build in the Green Belt) and the lack of declared criteria for the choice between sites.

Furthermore, given that the relocation is being funded by public money, HIPC object to the lack of scrutiny of the process and outcome of the site selection.

### **Site 1**

#### Site 1

- Will remove a permissive path regularly used by walkers and cyclists.
- Will cut through an area with a well documented richness of wildlife.
- Conflicts with the range of transport options being put forward for essential access to the Waterbeach New Town development.

### **Sites 1 and 2**

- **Sunclose Farm:** Both sites are close to an established (since 1972) business employing a work force of over 130. Over the years, the business has invested substantially in infrastructure to make it the thriving business it is: the investment allows cropping from May to September. Due to the nature of their business (fresh produce) we are very concerned to the future of the business and the staff they employ. The fresh fruit business, unlike general arable farming, requires considerable fixed investment and a period of time to become established. This farm has recently invested in a new packhouse using latest environment techniques to reduce considerably the electricity requirements. The investment can only be justified if the entire acreage is used.
- The farm shop is also an amenity for local people wishing to buy local rather than soft

fruit imported, with consequent food miles, from Spain or elsewhere. There is an additional local concern. Histon and Impington were once centres of the soft fruit growing industry (q.v Chivers Farms and the Chivers jam factory in the village) but except for the fields of Sunclose Farm within the Impington boundaries there was no soft (nor hard such as apples) fruit grown commercially in the villages. Sunclose Farm is the last remaining link with the raison d'être of the villages.

- Although AWA claim a new works will be less intrusive, especially with odour, they did admit at the briefing to us that this could not be guaranteed. Indeed, the concerns have been reflected in the drawing of the site boundaries by using arcs defining 400m separation from any dwelling. Having made this allowance for the possibility of odour or other discharges, it is reasonable to assume that it will happen. Hence both Site 1 and 2 being upwind prevailing wind from a major area of inhabitation (and one that is being considerably expanded) strikes us as nonsensical when a site with fewer downwind residences is available.
- Despite assurances on odour, Site 2 could be an actual harm to the soft fruit business through tainting the produce, or an apparent harm as large scale buyers would wish to avoid the risk of tainted produce.
- **Evolution Business Park:** Is an expanding business park between Sites 1 and 2. Originally a warehousing development this is now a major employment site of mainly office based high tech employees. Siting a STW next door will be detrimental to the expansion of the park, a park which has recently been purchased by Cambridgeshire County Council in order to be able to fund its ongoing activities.
- Both sites are close to residential and business areas. This will cause many issues during the construction of, and ongoing maintenance and operation of, the STW
- During their proposed construction both sites will cause safety concerns on the narrow road (Butt Lane) used by many cyclists to go to Impington Village College. The Evolution Business Park metamorphosis over recent years from warehousing to office use has increased considerably the vehicular traffic during the journey to school times. In addition, this route is used for access to the Household Waste Recycling Centre, exit from the Park & Ride site, residents, and as a diversion if there are hold-ups or work on the A14.
- And during operation it is expected that approximately 150 HGV movements a day will be necessary. HIPC object most strongly to the possibility of these using Impington Lane/Burgoynes Road/Milton Road because of the nature of the road (tight

bends, poor visibility, no footpath, the grade I listed St Andrew's Church).

Furthermore, this number of movements will have a significant negative impact on Butt Lane which is an essential access route.

- Both sites will severely and negatively impact on the Mere Way. The Mere Way is critical for:
  - access to open space for the high density NECAAP development. It is identified as a key route
  - Cam Metro, and cycle/pedestrian access to Cambridge, especially from Waterbeach New Town in order to a) encourage modal shift and b) reduce pressure on the fixed size Milton A10/A14 roundabouts

Both sites are damaging to the economics of the area, the community locally and are potentially sources of continuing harm to sizeable populations.

In terms of the comparison of sites we note that Sites 1 and 2 appear to require new connections for the existing site for foul water. This will be a major "pipe" and its construction will be disruptive. For these sites a separate clean water tunnel needs to be constructed, over an extended loop on the plans we have seen, across to the Cam. Site 3 conversely can have both connections along the same route and the total length is much reduced to less than half either of the other two options. Site 3 also has less business infrastructure than sites 1 and 2 hence Site 3 will have substantially less impact on established businesses, and would not incur the necessary extensive expense of compensation payments for the disruption/termination of an existing profitable business.

### **River Cam**

We understand that the Cam Conservators used to report that the section of the River Cam from Jesus Lock to Baits Bite Lock only remained as a waterway at all during dry spells due to the outflow from the current STW topping up the water levels. Climate change scientists predict greater variability in weather patterns and in particular increased periods of below average rainfall or even droughts, offset of course by the heavier rainfalls in the extreme events. Not having the outflow in this section, irrespective of the site chosen would be an ecological and social disaster:

- Cambridge is a major tourist attraction and the Jesus Green area is part of that. If the knock on effect of the loss of water in the lower reach needs flow from the backs are, a significant tourist attraction would be detrimentally affected
- Furthermore upstream of Cambridge there are many chalk streams, an extremely

rare (both in the UK and worldwide) and important habitat. Under the current flows there have been reports over recent years of these drying out in summer. Requiring any more water to drain down for the lower reaches would imperil further these precious irreplaceable habits.

- The stretch of water from Jesus Green Lock is a significant recreational and sporting facility. Considerable numbers of all ages row on this stretch and with the current emphasis on wellbeing, fitness and reducing obesity to eliminate this opportunity from the locality would be a severe setback
- Once Waterbeach New Town is constructed, site 3 will be inserting the cleansed water (and also that from the increased housing in the Cambridge sub region) into this stretch thus enhancing the scope for better management of the levels in the upper reaches of the river.

HIPC holds that whichever site is chosen, the outflow must be situated in the same stretch of river as at present (ie Site 3, Sites 1&2 Option A) to preserve the amenity of the River Cam. To not do so would be an arrogant use of authority to override the legitimate needs of the area.

## **Site 2**

### *Odour*

Odour will, from time to time, be a problem. Particularly we note:

1. the technology to be used has yet to be chosen (admitted in correspondence with Parish Councils that have sought a site visit)
2. the development will be cash constrained and if there are unforeseen costs in the civil engineering ground works a cheaper technology will of necessity be substituted
3. the current facility was updated to the latest technology in 2015 and still has an odour issue
4. it should also be noted that there are occasions with the current site when weather conditions (temperature inversions) lead to still air, and these conditions that cause odour to spread over considerable distances.

Furthermore, the National Policy Statement for Waste Water makes it clear that measures should include locating the main odour sources away from sensitive developments (such as housing, schools and hospitals, and other sensitive land uses including recreational facilities, commercial premises and open spaces).

Site 2 is in close proximity to

1. the Wendy House Nursery (**at** the 400m limit).

The Nursery currently has over 120 local children on roll and employs 40 staff.

Conservation and learning in the natural environment is at the heart of the Nursery's ethos and the importance they place on outdoor learning is the main reason why so many local families choose to use The Wendy House to care for their children. It goes without saying that should the CWWTPR relocation be approved at site 2 that this local business, that has recently undergone considerable financial investment, could be seriously negatively impacted.

The Nursery is creating a nature reserve just beyond their own woodland area, where the children can further their development and understanding of the importance of the natural world, local environment and how to protect it. The Wendy House is unique in its approach to childcare and educating the children in areas of conservation and helping them to understand how we can all help to make a difference to our wildlife and environment, which can help ensure future generations preserve our natural world.

2. a secondary school (Impington Village College), with more than 1,300 pupils on roll

3. a special needs school (The Cavendish School, under development)

The school has a planned capacity of 80 pupils with autism. Autistic individuals are particularly sensitive to their environment, and can be especially sensitive to odour.

4. a hospital (Spire Cambridge Lea)

5. the Histon & Impington Recreation Ground, in use all year round, with floodlit facilities used daily until 10pm

6. Histon Football Club

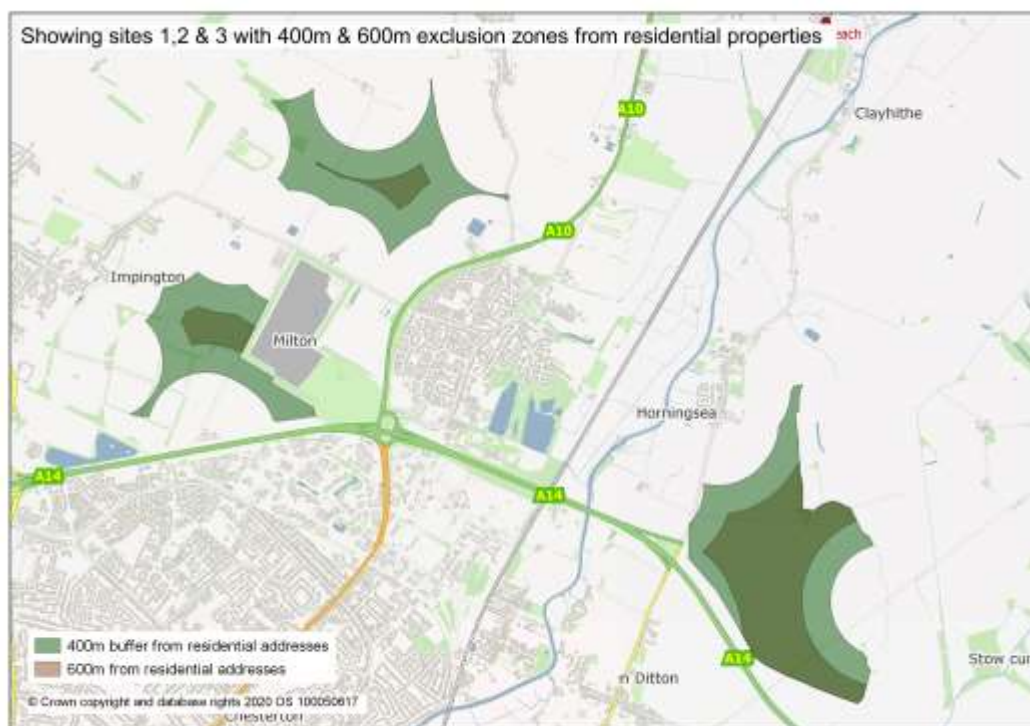
**All** these locations are high sensitivity receptors, and require additional protection. We object strongly to the lack of additional consideration of these sites.

Furthermore, we challenge that the 400m buffer zones used are acceptable. Whilst the Minerals and Waste plan sets this figure, this was for small scale sludge treatment agricultural works, and accepted by the Inspector because there were **no plans** for a large new sewage treatment plant in the County.

This will be the largest waste water treatment plant in the county so HIPC demand the 600m

distance used elsewhere in the UK (as reported by the AWA representative on the Zoom call to Parish Councils on 12<sup>th</sup> August).

This map demonstrates the major flaw arising from the use of 400m buffers. In both cases buffers are from residential properties identified from Ordnance Survey AddressPoint data.



Sites 1 & 2 become too small to accommodate the necessary requirements.

#### *Protected species*

Site 2 has been identified as the site of the largest breeding population of the common toad. Notwithstanding its name, the common toad is a section 41 (2006 Natural Environment and Rural Communities (NERC) Act) list species.

#### *Green Belt development*

Furthermore, all three proposed sites are in the Green Belt and the adopted Local Plan (2018) for SCDC states that:

*Policy S/4: 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.*

However, the consultations on the replacement plan (this time for both Cambridge City and



SCDC area), asked residents their views on options for amending the policy, including an option to build out to a small degree from the City Boundary in order to meet pressing needs. The following question was posed:

Should we look to remove land from the Green Belt if evidence shows it provides a more sustainable development option by reducing travel distances, helping us reduce our climate impacts? Yes / No

The initial feedback reported by both SCDC and Cambridge City of the responses was:-

*“Comments on the Green Belt were very varied. While overall, views from members of the public and community groups appear to view Green Belt release negatively, this was not universal and some members of the public were strongly in favour due to sustainability arguments, if locations with good sustainable transport accessibility was chosen. Overall, across all responses, Green Belt release which provided a more sustainable development option by reducing travel distance, helping to reduce climate impacts (question 37) was in fact supported. Several responses stated that if Green Belt release was to take place, new areas should be incorporated into the Green Belt to compensate, or that green corridors into the city centre should be retained.”*

Site 2 is situated adjacent to a vehicular access under the A14 just behind the Cambridge Regional College (CRC), which has limited space to expand and limited outdoor recreation and education facilities. Across the road from CRC is the Cambridge Science Park which is full, and is an attractive location for innovative businesses, the like of which are encouraged by this government in order for this sub-region to provide the necessary economic growth to fulfil their overall economic plans. The attractiveness of the site can be judged by the avid take up of the small commercial sites along Kings Hedges Road in the region of the Science Park and CRC. Should the Local Plan agree with the responses encouraging environmentally sensitive local uses of the green belt, the area immediately through the vehicular access would be a prime location.

Site 2 is an obvious potential site for future development and bearing in mind how precious land is when development takes place on green belt land we as a society need to demand that we use that land to its full potential. Locating the water treatment works at Site 2 would be a waste of the potential of this land. It is right next to the guided busway, this location has almost unparalleled cycling and public transport links building the treatment works here would be a waste of the potential of this site.

Site 2 has exceptional and unique public transport connectivity with; direct bus links to both Cambridge train stations (Central Cambridge and Cambridge North), to Central Cambridge

and the bus station, to Addenbrookes hospital and Trumpington Park and Ride (which connects to the M11 corridor). The busway has direct links to North Cambridgeshire via St Ives, Huntingdon and other communities all the way to Peterborough. There are also local bus links across the north of Cambridge. There is excellent cycling connectivity along the busway into central Cambridge via the busway and an ever expanding network of cycle paths and up north to St Ives. Furthermore the Combined Cambridgeshire and Peterborough authority has a plan for a metro system for the whole of the sub region has plans for a route passing this site and using the vehicular access under the A14. Bearing in mind how precious this land is if Site 2 is to be developed siting a water treatment works here would be a complete waste of the strategic potential of this location.

We as a community are demanding better from the planning system and think locating the water treatment works here would be a wasted opportunity.

Furthermore, to forestall such development by a premature decision ahead of the Greater Cambridge Local Plan would be a denial of the democratic process.

### **Site 3**

The Site Selection Technical Summary reports: *Site areas I and J perform marginally better than Site L, due to the proximity of site L to Cambridge Airport and sensitive watercourses. However, it was considered that the potential impacts could be mitigated by readily available technical solutions and it would not be appropriate to discount site area L based on these criteria at the Fine Screening stage.*

However, Marshalls, the major employer at Cambridge Airport, are planning to relocate and offer the site for redevelopment. Indeed, they anticipate the site being redeveloped by 2030 - <https://www.cambridge-news.co.uk/news/cambridge-news/marshall-issues-update-cambridge-airport-17642951>. The proximity of the site to Cambridge Airport is therefore not relevant, and should be disregarded.