Appendix 1

Cambridge City Council and South Cambridgeshire District Council Proposed Joint Response to Cambridge Water's Draft Water Resources Management Plan (WRMP) 2024

This response is made on behalf of Cambridge City Council and South Cambridgeshire District Council ('the Councils').

Overview

The water environment of Greater Cambridge, including its rivers and precious chalk streams, are key to the area's environment and biodiversity and the health and wellbeing of its population. The Councils have recognised that we face a climate and ecological emergency, and the state of the water environment is of significant concern for the Councils.

The Councils are in the process of developing the Greater Cambridge Local Plan, which covers both Council geographical areas. Greater Cambridge, along with a small part of Huntingdonshire District Council's administrative area, aligns with the Cambridge Water supply area.

It is critical that the draft Cambridge Water WRMP provides certainty that enough water will be supplied in a timely way to support the development of homes and jobs, which will need to be set out in the Greater Cambridge Local Plan covering the period to 2041, in this nationally important economic area. At the same time this water must be supplied from sources that do not have a detrimental environmental impact. Any proposals within the WRMP should also provide for real improvements to the water environment as soon as possible.

The Councils note and support the overall aim of the draft WRMP, in that it seeks to address identified development needs whilst also achieving the abstraction reductions identified as necessary by the Environment Agency to protect the environment, and then seeks to move towards improvements, following the approach set out in the draft Regional Water Resources Plan for Eastern England. The Councils are not the responsible authorities in water resources planning and would look to the expertise of the Environment Agency to assess whether the measures proposed in the Cambridge Water WRMP will be effective in providing a sustainable water supply. We nevertheless ask that Cambridge Water continues to work cooperatively with the Councils as the WRMP is finalised. The Councils as local planning authorities are already required to have regard in their decision making on planning applications to river basin management plan objectives, including the impact of abstraction to meet water supply needs, and therefore it is essential that we can have confidence in the approach set out by Cambridge Water in the WRMP.

The Councils urge Cambridge Water along with the Environment Agency, DEFRA, DLUHC and OFWAT to work effectively together and in a timely manner to resolve the final WRMP and to bring forward the necessary supply and demand measures as rapidly as possible.

It is also important to understand the cost of all the proposed measures and the impact this will it have on customer bills. Further education initiatives in water usage are encouraged to inform people about the serious water stress in the region. Many people are very unaware, and don't understand the importance of conserving water.

The Councils' response is structured around the following issues:

- Planning for anticipated development needs
  - Planning for current development
  - Longer term planning

- Measures proposed to enable capacity
  - Demand management
  - Infrastructure provision
    a. Transfer to Cambridge Water
    b. Fens Reservoir
  - Drought measures

- Environmental goals
  - Environmental destination
  - Environmental improvement schemes

Planning for anticipated development needs

It is important that the WRMP properly reflects existing and committed development and seeks to plan for anticipated development needs. Evidence supporting the Draft WRMP indicates that it has taken account of adopted local plans, but also that it has applied an uplift for future development reflecting regional scenarios developed to inform the Water Resources East Regional Water Resources Plan.

Planning for current development

Ahead of the publication of the Draft WRMP, the Environment Agency has raised concerns as a consultee on planning applications (such as Darwin Green, an allocated site on the edge of Cambridge) requiring further information on the basis that the proposed development may through additional demand for potable water use, increase abstraction and risk further deterioration to water bodies in the Greater Cambridge area. Their comments highlight that the EA will be reviewing the Draft WRMP24, to assess if the required changes to licences have been included and sufficient water supplies are available for growth and the environment. The Councils consider it an urgent priority that Cambridge Water and the Environment Agency work together, with other agencies where necessary) in order that there is confidence in the WRMP and to avoid delays to decisions on planning applications on sites allocated in current adopted Local Plans

Longer term planning

It is important that the WRMP also plans for future anticipated development needs. In January 2023, the Councils agreed updated objectively assessed needs for jobs and homes. This was guided by updated evidence taking account of 2021 census information and evidence regarding jobs growth which showed that Greater Cambridge's key sectors have continued to see fast growth, even accounting for Covid-19 impacts. The updated evidence showed an increase in the objectively assessed need for jobs and homes compared to that identified in 2021, identifying needs between 2020 and 2041 of 51,800 homes to support 66,600 jobs.

Having identified the needs, the Councils are required to confirm appropriate targets for jobs and homes to plan for in the new local plan, taking into account a range of potential constraints, as well as economic, social and environmental impacts. The starting point is a requirement in the NPPF to aim to meet the identified needs, to avoid the negative consequences of not meeting them, for example on house prices, long distance commuting, and the important Greater Cambridge economy. Based upon known challenges, key to this will be establishing the amount of water that can be supplied to meet future water demand from sustainable sources without unacceptable harm. If the plan making process is not to be significantly delayed, it is therefore critical that Cambridge Water, working with bodies such as Water Resources East, the Environment Agency, DEFRA and the Councils identify and agree solutions to deliver a sustainable water supply that also protects and enhances the environment.

Based upon the technical appendices to the draft WRMP, officers believe that the dwellings trajectory that has informed the draft WRMP is broadly in line with the housing development trajectory within the existing adopted Local Plans and the development set out in the Greater Cambridge Local Plan First Proposals (2021), along with growth identified in the published Huntingdonshire housing trajectory for the area within the Cambridge Water Catchment. Following our publication of updated higher needs figures, the revised needs, and its impact upon water demand needs to be understood urgently.

The information relating to non-household growth accounted for in the draft WRMP is provided in the technical report found at Appendix C2 accompanying the draft WRMP. This indicates that it has taken account of economic trends in different sectors. The Councils however require further information to confirm that the levels of employment growth being used in forecasts are consistent with the evidence being used for the Local Plan, including for the updated needs, in order to give confidence around future decision making.

The Councils understand that the underlying forecasts for household and non-household growth are already being revisited by Cambridge Water as part of the development of the final WRMP. Therefore, it is crucial that Cambridge Water collaborate with the Councils so that the relevant data and evidence base that underpins the development of the new Local Plan can be used to inform this process.

Measures proposed to enable capacity

Demand Management

The Councils are supportive of the demand side measures set out in the WRMP for both household and non-household uses. Demand side measures provide opportunities to make better use of the water available through using water more efficiently, minimising waste by leakage control and smart metering and re-using water. The effectiveness of these measures will need to be continually monitored in order to ensure that they are providing the predicted savings.

The Councils question the timetable for universal smart metering by 2035, as the neighbouring water company Anglian Water aim to achieve this by 2030. The Councils believe that this should be brought forward as soon as possible. The Councils are also aware that there have been occasions where single meters have been installed for groups of properties such as flats. The Councils have taken steps through conditions in planning consents sought to ensure that individual dwellings are fitted with the means to monitor and measure their own water consumption, but the water company should be ensuring that individual properties are metered to deliver the most effective water management.

The Councils are also supportive of the use of site-scale rainwater harvesting and greywater reuse as set out in the draft WRMP in section 9.5.4, under other options. The Greater Cambridge Local Plan: First Proposals (November 2021) included a proposed policy on water efficiency requiring that new housing development should be designed to achieve 80 l/p/d unless demonstrated impracticable. Our Integrated Water Management Study provided evidence to show that 110 l/p/d is achievable by making full use of efficient fixtures and fittings, and that 80 l/p/d can be achieved with the use of water re-use measures on site including rainwater harvesting and grey water recycling. It showed that the cost effectiveness improves with the scale of the project and that a site-wide system is preferable to smaller installations. The largest savings would be at a site-scale, although smaller schemes should also be encouraged as a way for all new developments to reduce water use.

A standard of 80 l/p/d currently goes beyond what Local Authorities are able to require (as set out in the Deregulation Act 2015). In our response to the Regional Water Resources Plan we asked Water Resources East to consider whether the regional plan could support Local Authorities to be able to set more stringent water efficiency policies to reflect their local circumstances. We would also welcome assistance from Cambridge Water in lobbying Government and also providing evidence to support our policy and show that this is achievable.

We are also proposing to include in our Greater Cambridge Local Plan a policy that would require non-household development to achieve full credits for category Wat 01 of BREEAM unless demonstrated impracticable. Given the known challenges with water supply impacting our area, we would welcome any assistance Cambridge Water could offer to support this policy, which will also be of benefit to the demand management proposals in the WRMP.

Even if new development is extremely water efficient, it will still lead to an increase in water required unless this could be offset, potentially through retrofitting in existing buildings. The Councils would welcome further exploration of how this could be achieved, either on a site/campus or an area wide basis reflecting on best practice elsewhere with officers from Cambridge Water and the Environment Agency.

The Councils are supportive of the proposed Government changes to the labelling of white goods and household appliances to show their water efficiency, which is referred to in the WRMP. This should also include the requirement of water usage controls on electric power and rain showers. Again, the Councils would urge Cambridge Water to lobby the Government to introduce this as soon as possible.

Infrastructure Provision

a. Transfer to Cambridge Water

The Councils support in principle the proposed transfer of water from Anglian Water to Cambridge Water, from Grafham Water reservoir, which is essential to provide additional supply ahead of the Fens Reservoir being operational and which will support the abstraction reductions required by the Environment Agency to protect the chalk streams. The draft WRMP states that following discussion with Anglian Water, both companies have proposed the acceleration of the work, as part of the Defra Accelerated Scheme. If approved this would enable the water transfer to be available in about 2027, rather than 2031. The Councils firmly support the acceleration of this programme, due to its potential in the short term to enable the management of ground water abstraction required to prevent deterioration to the water environment. We urge the water companies the Environment Agency and DEFRA to complete exploration of the technicalities of delivery of this scheme as soon as possible.

The draft WRMP states that the transfer is time-limited, likely for a 6 year duration. However, once the transfer is operational it is essential that it continues to supply water in the period until the Fens Reservoir is operational (rather than limited to a specific number of years) to prevent environmental impact and the Councils would like this to be clear in the WRMP.

b. Fens Reservoir

The Councils also support in principle the proposal for the Fens Reservoir which is being developed in partnership by Cambridge Water and Anglian Water through the RAPID process and which will provide additional strategic-scale water supply, with half of the water to supply Cambridge Water and half to Anglian Water. The Councils consider making provision for an alternative to groundwater abstraction at current levels is essential for the future growth of the area into the middle of the century. The draft WRMP states that the reservoir ‘could be in supply between 2035 and 2037’. Whilst noting the need for robust regulatory and consenting processes, the Councils therefore support the prioritisation of this essential new infrastructure so

that the environmental benefits from reduced abstraction can be realised as soon as possible.

Drought measures

At section 11.3.4, Cambridge Water ask for views on the application of drought measures in the plan in lieu of Regulation 19 exemptions to defer the reductions in licence caps, where there would remain a risk to deterioration of waterbodies. It is unclear from the plan what this would mean in practice and how frequent the use of Temporary Use Bans (TUBs) for domestic properties and non-essential use bans (NEUBs) for commercial activities would be. However, in principle, the Councils would prefer the use of drought measures to stop non-essential use rather than deferring the reductions to abstraction licences and continuing to abstract at levels that would cause damage to the chalk streams and the wider environment. In this way everyone is playing their part in using water wisely. A step change in responsble water use through education and the appeal for restraint communications to the public also needs to be delivered.

The Councils would urge the water companies to use these powers when they are needed to protect the environment. We would like to understand why such powers were not used at the peak of the heat wave in 2022.

Environmental goals

Environmental Destination

The draft WRMP includes an environmental destination to improve waterbodies by 2040 based on the Business as Usual Scenario (BAU+). This is consistent with the draft Regional Plan, but the Regional Plan is also looking to step up to the 'Enhance' level from the mid-2030s subject to further investigations being completed. In line with comments we made to WRE on the Regional Plan, the Councils think that plans need to be ambitious and seek to restore the status of our watercourse and we are therefore supportive of the 'enhance' environmental destination. Table 16 of the draft WRMP, shows that only the 'enhance' destination includes enhanced protection for our precious chalk streams, sensitive headwaters and SSSIs. Noting the challenges associated with the investment required, we would nevertheless therefore urge Cambridge Water to commit to the 'enhance' environmental destination in the WRMP as BAU+ does not provide adequate protection.

In section 6.10.1 of the draft WRMP it is recognised that further work will be carried out in the next Asset Management Period (AMP) 8 (2025-2030) and that flagship chalk stream river restoration projects will commence during this period. These enhancements are to deliver hydromorphological benefits to the chalk streams to improve and enhance them in the short term, before flows are returned to them in the future. The measures proposed would need to be subject to the appropriate approvals and as a form of mitigation, they are welcomed, but the return of flow to the chalk streams will only be made once the new major sources of supply take effect. Therefore the Councils would again stress the importance of the water

transfer and Fens Reservoir in bringing about these improvements and that they are implemented as soon as possible.

Environmental Improvement Schemes

The Councils support schemes to improve the chalk streams and water courses across the area, subject to the appropriate approvals. The Councils have secured funding from the Cambridgeshire and Peterborough Combined Authority to carry out partnership projects which make local chalk streams and the species they support more resilient to current low flow scenarios. Both Councils are committed to doubling nature in Greater Cambridge, and we would urge a coordinated approach to actions including with other environmental groups in order to secure resources and realise the greatest benefits. The Councils would also like to work with Cambridge Water to explore opportunities for water source enhancement through water storage / infiltration to the aquifer, including what could be achieved through the planning process.