

APPENDIX 1

Cambridge City Council and South Cambridgeshire District Council response to the Emerging Water Resources Regional Plan for Eastern England (January 2022)

Q1 In our emerging plan, have we gained a clear initial view of the problem of future water deficits across all sectors and the environment?

The emerging plan is clear about the scale of the future water deficit in the region and that this is already a problem today.

As local planning authorities we are required to identify and plan for the needs of our areas. This includes planning to support economic growth and productivity, and the housing needs of all parts of the community. However, we are also acutely aware of the need to protect and enhance the environment.

Our evidence study, the Greater Cambridge Integrated Water Management Study (2021), commissioned to inform the emerging Greater Cambridge Local Plan, highlighted the Environment Agency's existing concerns that human impacts on the water cycle in and near Greater Cambridge are already an issue, and cause for concern due to making the environment less resilient to the natural variability between drought and flood conditions causing environmental harm. Our evidence also made clear that if additional future water supply is not identified it would be a potential 'show stopper' to meeting the economic and housing needs of Greater Cambridge, as discussed below.

The Greater Cambridge Local Plan is still at an early stage in its preparation. The First Proposals consultation was carried out in late 2021 (Regulation 18), which sought views on the identified development needs of the area and the preferred options for how they should be planned for.

In the First Proposals the Councils were clear that the preferred option for growth is contingent on there being evidence as the plan progresses that an adequate water supply would be available to meet the development needs identified without unacceptable environmental harm. If it is concluded through the water planning process that it is not possible to demonstrate an adequate supply of water without unacceptable environmental harm to support development ahead of strategic water infrastructure being in place, there may be a need for the plan to include policies to phase delivery of development. It could mean asking neighbouring authorities to meet part of Greater Cambridge's identified needs, such that needs may be

displaced to other locations that will also need evidence of adequate water supply, or as a last resort not planning to meet some of our identified need for jobs and homes in the emerging Greater Cambridge Local Plan. It is critical that the Regional Plan takes full account of growth forecasts in emerging local plans as well as top-down growth assumptions to ensure a sound strategic plan, in order to give confidence that water supply can be put in place in a timely way to support growth, and thereafter that key strategic water infrastructure is delivered as soon as possible to support the government's economic ambitions, and in order to assist the region to meet its identified development needs.

We have supplied a range of planning data to help with the water planning process. The Councils wish to continue to work with WRE as both plans emerge in order to ensure that future growth is sustainable and will not have an adverse effect on the water environment.

The Councils are pleased that the emerging water resources plan recognises the different pressures on public water supply including growth and climate change. We welcome the recognition that the greatest driver for additional water is the need to restore, protect and enhance the natural environment through the reduction in abstraction. In Greater Cambridge abstraction from the chalk aquifer has been identified as having a significant effect on the flow of water in chalk streams and the River Cam, which has consequences on the quality of these watercourses and biodiversity. The Council supports that the emerging regional plan recognises the importance of the chalk streams throughout.

Q2 In our emerging plan, are we taking the right approach to identify potential solutions to mitigate the challenge?

The Councils support the exploration of multiple ways of addressing the challenge of water supply, including demand-side and supply-side measures, large scale and smaller catchment scale measures and also short-term (now to 2025), medium-term (2025 to 2030) and long-term (2030 onwards) phasing. All of these measures will need to be considered to tackle the problem. The phasing of measures will be a key issue, with studies already indicating the need for short term measures to complement longer term solutions both for environmental reasons and to support areas to meet their development needs.

It will be important for the plan to recognise the differences between different areas or catchments within the region. For example, Greater Cambridge has a unique environment where the majority of the water for public water supply has historically

been abstracted from the ground, which has implications for the ongoing health of the chalk streams.

The emerging water resources regional plan shows a variety of modelling techniques that are being used to assess the best solutions, but these will also need to be informed by engagement with local stakeholders. The Councils would welcome further partnership working as the plan progresses in order that we can input further local knowledge into this process.

The emerging plan considers the level of environmental destination and the Councils support detailed exploration of these issues. As many of the options are once in a generation solutions, they need to be designed to be large enough to enable the wider environment to benefit through reducing unsustainable abstractions, whilst also taking into account climate change and development needs of the area. The environmental ambition or pace of the reductions in abstraction is also discussed and the emerging plan states that some catchments including the Cam and Ely Ouse may be prioritised given the sensitivity of the systems. The Councils are supportive of this prioritisation given the sensitivity of the chalk rivers and streams in the Cam and Ely Ouse catchment.

The emerging plan includes more strategic measures such as strategic water transfers, as well as local catchment based options. The local options seek to reduce flood risk, improve water quality, and increase carbon capture with an increasing focus on the use of nature-based solutions. The Councils agree that a range of measures will be needed to provide an adequate and sustainable water supply and support the approach proposed. The emerging plan does not set out details of specific schemes at this time and there are still many questions about how these solutions will be identified, selected, financed and implemented and under what timescales. The Councils are supportive of further work being carried out with stakeholders at a more local level at pace, given the urgent need in Greater Cambridge for resolution as part of the emerging Local Plan, and we would like to be involved in this work.

In addition to the proposals for homes, jobs and supporting uses, the Greater Cambridge Local Plan First Proposals proposes [14 strategic green infrastructure initiatives](#) within Greater Cambridge to be supported by new development. These were developed working with a wide range of stakeholders including Natural England and Natural Cambridgeshire. A number of the initiatives seek to address the same issues referred to above of reducing flood risk, improving water quality, and increasing carbon capture, and as such could support or form part of the local catchment-based options referred to in the plan. For the next stage of the Local Plan, the draft plan, we will be working with partners to refine the initiatives and identify how to deliver the initiatives, including how they may form part of the emerging

Nature Recovery Network. We would be keen to work with WRE to see how our initiatives can best support the emerging Water Resource Regional Plan, including to understand further how these relate to the findings of the Systematic Conservation Planning work referred to in this emerging Regional Plan.

It is noted that desalination plays a significant role in the emerging regional plan, and we welcome the references to this needing to be next generation desalination powered by 100% renewable energy generation. It will be important that alongside securing long term sustainable water resources, the plan also responds to net zero carbon by 2050, a key element of which is reducing energy demand. As such, it will be important that energy use and emissions associated with the supply-side measures, as well as embodied carbon, have been factored into the assessment of schemes, prioritising those with lower carbon emissions wherever possible. Costs to consumers must also be a key assessment criteria.

Q3 Does our emerging adaptive plan, including the immediate low-regret options such as reservoirs, look like it will help address the problem?

At this stage, the emerging plan is not clear on all the detail of the options, however of those that are presented the Councils are supportive in principle of the development of the Fens Reservoir as a long-term solution to provide additional water supply to Greater Cambridge. As the reservoir would not be operational until at least 2035, the Councils are particularly concerned about the supply of water in the interim period.

The plan sets out shorter term demand-side options which the water companies would need to include within their Water Resources Management Plans (WRMPs) such as further leakage reduction and reduction in per capita consumption (PCC) which are sensible. In particular, the reduction in PCC should be addressed by making the public more aware of the problem, the value of water and what they can do to reduce their consumption. As well as continuing the role out of metering responding to the designation as an area of serious water stress, we agree that options such as the introduction of smart metering should be considered, to ensure that people are much more aware of the amount of water they are using each day. The plan talks about the Government promoting white goods labelling for water efficiency and promoting more water efficient white goods. We urge WRE to encourage implementation of this as soon as possible. The Councils' views on PCC and building regulations in new development are included under Question 6 below.

The demand-side measures will go some way to reducing the amount of water needed. It will be crucial that the WRMP provides confidence around the certainty and deliverability of some of the demand management measures proposed, particularly behavioural changes where these are relied upon, particularly in relation

to housing growth options. Therefore, we would suggest that the regional plan needs to be supported by more evidence to show how these measures will be effective. This evidence will also be useful in the development of our own proposed policy in the Greater Cambridge Local Plan to support highly water efficient new developments (also see Question 6).

In order to provide for identified development needs without unacceptable environmental harm, there will be a need for further supply of water in Greater Cambridge until water could be supplied from the proposed Fens Reservoir. The Councils welcome the recognition that this could be from water transfers and that an Anglian Water to Cambridge Water transfer is referred to in the plan as a potential solution. In addition water re-use schemes are a potential solution in the medium-term. The Councils would urge the water companies to consider this in their WRMPs and bring forward supply side as well as demand side measures as soon as possible.

As identified in our response to question 2, the identified range of solutions are key to addressing the future needs of the region and the Greater Cambridge area.

Q4 In our emerging plan, are the technical methodologies, processes and decision support tools which we have used robust and appropriate for the task?

The decision support tools are reflective of the complex problem that the regional plan is trying to address. The Councils do not have any direct view on the methodologies or modelling being used but would reiterate that local partners should continue to be involved in the process to 'ground truth' the results. The plan is clear that this process of partnership working to co-create the plan will continue.

Q5 Has our emerging regional plan been cocreated in a fair, open and transparent process involving the right stakeholders and organisations?

The list of organisations that are WRE members and the collaboration with other existing programmes in the region set out in Chapter 8 reflects a wide breadth of knowledge and experience that will help to develop the plan. The current consultation will also allow wider stakeholders and members of the public to put forward their views. We would ask that you continue to liaise directly with colleagues in our Greater Cambridge Shared Planning Service as the plan develops.

Q6 Are there any areas which you feel WRE should be considering which are not currently reflected in our plan? What have we missed?

The emerging plan is aiming to achieve a PCC of 110 litres/person/day by 2050. To achieve this new housing developments will need to be as water efficient as possible and existing homes may need to be retrofitted. The plan could provide further detail on this, as explored below.

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. 80 l/p/d is being achieved through community scale water re-use at the University of Cambridge development of Eddington in Cambridge and is an example of best practice.

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). Therefore, we ask WRE 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 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. Again, we think that WRE should consider how the regional water plan can support higher water efficiency in new developments.

Even if new development is extremely water efficient, it will still lead to an increase in water required unless this could be offset. Potentially this could be through retrofitting in existing buildings. The Councils would welcome much further exploration of how this could be achieved in the regional water plan.

The Councils are pleased to see Chalk Stream Protection listed as a specific intervention and this supports our identification of this priority as the first of 14 strategic green infrastructure initiatives in the Greater Cambridge Local Plan First Proposals, as referred to under question 2. WRE's work regarding Chalk Stream Protection should consider how to complement work being done by other agencies. For example, Cambridge City Council and South Cambridgeshire District Council have secured funding from the Cambridgeshire and Peterborough Combined

Authority to carry out projects which make local chalk streams and the species they support more resilient. Both Councils are committed to doubling nature in Greater Cambridge, and we would urge a coordinated approach to actions in order to secure the greatest benefits.