

## Appendix A

# Proposed Joint Response to Draft Regional Water Resources Plan for Eastern England (November 2022)

### Overarching response:

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

There is currently an infrastructure deficit in terms of water supply infrastructure that needs to be addressed to protect and enhance the environment and support meeting the development needs of the Greater Cambridge area. The regional response to the water issues is long overdue, but the draft regional plan now presents positive interventions to address the significant issues facing the area. The plan needs to be ambitious and seek to restore the status of our watercourses. Planning for the 'enhance' scenario should be central to this.

New supply side measures such as the Fens Reservoir and connections between the Cambridge Water supply network and Anglian Water's much wider network need to be delivered as soon as possible, and opportunities should be taken, including in liaison with government, to do this. More needs to be done to address the demand side. The Councils have shown support for implementing strong water efficiency policies in their emerging Local Plan which can be applied to new developments, but wider measures such as smart metering and support to reduce leakage in networks, existing homes and other points of consumption need to be rolled out as soon as possible.

If action isn't taken it will impact on the Councils' ability to deliver the homes and jobs that people need, and to support the nationally important Greater Cambridge economy, as we are required to do by the government's National Planning Policy Framework unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. At the same time, we also need to ensure the local environment and water bodies are protected and enhanced, and water quality is significantly improved.

This response is drafted prior to the release of the individual water company plans (Water Resource Management Plans). We will need the detail from the WRMPs to fully understand the local water supply situation when these regional proposals are applied at the local level. This could also impact on our views on the regional plan solutions.

### **Proposed response to consultation questions:**

#### **Question 1: Have we presented credible projections of future water needs and deficits across all sectors and the environment?**

It is vital that water resource plans have a full understanding of future water needs.

The plan is accompanied by a document entitled 'Demand Forecast November 2022' which sets out in detail the approach that was taken to forecast future demand for water resources. The document sets out a wide range of methods used to identify potential development scenarios. This includes analysis of trends, Local Authority Plans, historical completion rates, and also strategic growth plans. It is important that growth projections take account of local development plans which reflect local circumstances. From the narrative it appears that the scenario to be used as the core scenario informing individual Water Resource Management Plans (WRMPs) seeks to reflect existing development plans in Greater Cambridge and an allowance for future growth. This is supported, but the detail will only become clear in the Cambridge WRMP as the detail is not included in the regional plan.

Cambridge and South Cambridgeshire District Council are supportive that the forecasts consider both household and non-household consumption. The water demands of economic development must be fully considered. The Demand Forecast document advises that modelling has been done characterising geographical areas and individual sectors. The Councils have commissioned their own evidence regarding employment growth, which has been recently updated. The detail is not present in the demand forecast document to sense check the figures, therefore further information is requested regarding these assumptions, including specifically for the Greater Cambridge area.

Cambridge and South Cambridgeshire District Council are preparing the Greater Cambridge Local Plan, which will plan for development in the area to 2041 and beyond. The plan is still in preparation, and the Councils will need to understand the water resources available. The Councils will continue to liaise with WRE,

Cambridge Water and Anglian Water as the Draft Greater Cambridge Local Plan is produced and the water plans are finalised.

**Question 2: Do you support WRE's ambition to achieve the outcomes associated with the 'Enhance' Environmental Destination scenario by 2050?**

Cambridge City Council and South Cambridgeshire District Council strongly support the ambition to achieve the 'Enhance' environmental destination.

Although WRE's ambition is the 'Enhance' scenario, the current plan is based on the less ambitious 'Resilience' (BAU+) scenario. The reason given for this (page 12 of the plan) is that further investigation is required and to ensure alignment with company-level Water Resource Management Plans (WRMPs). WRE will need to ensure that the further work is prioritised and carried out to maintain the momentum to achieve the higher aims of the 'enhance' scenario.

The BAU+ scenario provides extra protection for European Protected Sites, but chalk streams are not currently protected in this way. The Councils would urge WRE that it is imperative that the regional plan should do everything it can to restore waterbodies, particularly chalk streams, to 'good status'. Abstraction is already having a detrimental impact on the precious chalk streams and the Councils would oppose any delay in the sustainability reductions relating to water company abstractions.

**Question 3: Have we taken the right approach to identifying potential solutions to mitigate the projected deficits?**

The approach set out in the plan uses a list of multi-sector performance metrics and considers the benefit and potential risks to the environment to arrive at a 'best value' plan. This is a complex process and difficult to critique in detail. It is certainly preferable to a 'least cost' plan which could potentially sacrifice important elements, potentially at the cost of the environment.

**Question 4: Does our proposed plan strike the right balance between demand and supply-side options for the public water supply?**

The plan has a strong focus on demand side options but is also realistic that the scale of the water deficit will require new supply-side options in order to protect and restore the environment, and the Councils are supportive of this.

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. Whilst it is understood the effectiveness of these measures have been tested, they will need to be continually monitored.

The Councils will include policies regarding water efficiency in new developments in the new Greater Cambridge Local Plan. We are supportive of the reference to water reuse in the WRE plan and the recognition that Government also has a role to play in tightening building regulation standards for water efficiency. The Councils would welcome further exploration of how retrofitting of existing properties can be supported by the water industry.

Although there is a strong focus on demand side options, the plan is also clear that due to the scale of the water deficit (to reduce the amount of abstraction which is causing environmental harm and to take into account climate change) the development of new sources of supply is necessary. The Councils are supportive of the supply side options proposed for the Cambridge Water area and request that these are brought forward as soon as possible (also see response to Question 5).

**Question 5: Does our proposed plan include the right low-regret supply-side options in the short, medium and long-term?**

The Councils are concerned that there appear to be few short-term supply options in the Cambridge Water area which supplies Greater Cambridge. It is imperative that the other medium / long term options such as the water transfer from Anglian Water to Cambridge Water and the Fens Reservoir are brought forward as soon as possible to support the reduction in abstractions and meet the development needs of Greater Cambridge.

In the future following the development of the two strategic reservoirs it seems that the region will need to rely upon desalination for additional water supply to fulfil long-term environmental improvements. The plan states that these will be 'next-generation' desalination, which refers to the net zero carbon technologies that will need to be incorporated into the lifetime of the plants and an environmentally safe means of disposing of the brine water residue. The plan

suggests that further advancement of technologies will be needed before this is possible. The Councils are supportive that only such 'new generation' desalination plants are included in the plan, but there will be a need to monitor the progress of the development of such new technologies if they are to be relied upon in the plan. It is noted that the plan references the potential in the long-term for colocation of next generation desalination plants with hydrogen production. The Councils would recommend that this only take place if this co-location is with green hydrogen production in order to prevent a need to use fossil fuels.

**Question 6: Has our plan been co-created in a fair, open and transparent way, involving the right stakeholders?**

The Councils are supportive that at each stage of the plan public consultation is carried out and comments made are considered in the next stage of plan making. The Regional Plan is accompanied by a document 'Summary of responses to Emerging Regional Plan consultation' which provides a summary of the responses received to the consultation in January 2022. In particular, Chapter 2 of this document is a useful summary of the main themes arising from the consultation and how these have been addressed in the draft Regional Plan. The increased level of ambition on demand management to 110 litres/person/day by 2050 (it was 120 l/p/d in the emerging plan) is welcomed.

A key area raised by many stakeholders was to prioritise protection for chalk streams. The response to this is not very clear, other than that further investigations will be conducted to help prioritise where the biggest ecological gains can be made most quickly including for chalk rivers. More detail should be provided.

**Question 7: What further catchment-level analysis or activity would it be useful for WRE to prioritise?**

The Councils would urge WRE to prioritise the additional research into chalk streams referenced in annex 3 of the plan, in order to identify the best ways in which to enhance their protection. The health of chalk streams is dependent on both the amount of water relating to abstraction and the quality of water, which has direct links to water company Drainage and Wastewater Management Plans. 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.

**Question 8: Are there any areas which you feel WRE should be considering which are not currently reflected in our plan?**

The plan sets out a number of policy priorities for government on demand management that would directly support the success of the plan. The Councils are also supportive of these measures, in particular the building regulations roadmap towards tighter standards for water efficiency, the need for non-household action in order to reduce water consumption, and mandatory water labelling on taps, showers, toilets and white goods and support WRE in lobbying Government on these matters.

The Regional Plan also refers to the ministerial statement sent in a letter to local planning authorities encouraging them to adopt the tighter 110 litres/person/day in new homes. The Councils already have a policy in the adopted Local Plans requiring this. The ministerial letter also encourages local planning authorities to discontinue the use of the 'water calculator' element of Part G and focus on the alternative fittings-based approach. The Councils can only encourage this as both approaches are within the regulations. Real change can only come about if the Government actually change Part G of the Building Regulations. The Councils would request that the Government include an optional requirement of 80 l/p/day in areas of water stress, which will allow Local Authorities to more easily require this lower level within policies in their Local Plan. This is the level that Greater Cambridge included within the First Proposals Local Plan and a similarly challenging level for non-housing development. In addition, if these changes were made to Building Regulations, that they come in with immediate effect or with a minimum transition period. The Councils would encourage WRE to lobby the Government to make these changes.

The Council's consider that in parallel with bringing forward conventional, hard infrastructure measures to retain and import water (new reservoirs and pipelines), measures to retain rainwater on, and reduce run-off from agricultural land should be explored, evaluated, promoted and funded, especially where topography and conventional farming practice lead to high run-off rates and loss of rainwater into watercourses. Soil management techniques, such as cover-cropping, aimed at increasing soil carbon are known to have many co-benefits, amongst them increasing the water holding capacity of soils, reducing the need for summer

irrigation, improving flood resilience, supporting biodiversity and increasing infiltration rates to replenish the aquifer. Anglian Water and Cambridge Water should work with DEFRA (via ELMS and the Sustainable Farming Incentive, announced June 22) to further incentivise progressive soil management specifically in regard to enhancing the water management co-benefits. Anglian Water should assess the cost effectiveness of incentivising progressive soil management techniques as a contributor to water management and aquifer recharge alongside hard infrastructure. Cost-benefit comparisons should take into account embedded carbon cost of hard infrastructure versus carbon sequestration benefits of progressive soil management, using a realistic carbon pricing model.