

Greater Cambridge Shared Partnership  
South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge  
CB23 6EA

**Our ref:** AC/2022/131348/01-L01  
**Your ref:** 22/02771/OUT  
**Date:** 7 November 2022

**FAO: Fiona Bradley**

Dear Sir/Madam

**A HYBRID PLANNING APPLICATION FOR: A) AN OUTLINE APPLICATION (ALL MATTERS RESERVED APART FROM ACCESS AND LANDSCAPING) FOR THE CONSTRUCTION OF: THREE NEW RESIDENTIAL BLOCKS PROVIDING FOR UP TO 425 RESIDENTIAL UNITS AND PROVIDING FLEXIBLE CLASS E AND CLASS F USES ON THE GROUND FLOOR (EXCLUDING CLASS E (G) (III)); AND TWO COMMERCIAL BUILDINGS FOR USE CLASSES E(G) I(OFFICES), II (RESEARCH AND DEVELOPMENT) PROVIDING FLEXIBLE CLASS E AND CLASS F USES ON THE GROUND FLOOR (EXCLUDING CLASS E (G) (III)), TOGETHER WITH THE CONSTRUCTION OF BASEMENTS FOR PARKING AND BUILDING SERVICES, CAR AND CYCLE PARKING AND INFRASTRUCTURE WORKS. B) A FULL APPLICATION FOR THE CONSTRUCTION OF THREE COMMERCIAL BUILDINGS FOR USE CLASSES E(G) I (OFFICES) II (RESEARCH AND DEVELOPMENT), PROVIDING FLEXIBLE CLASS E AND CLASS F USES ON THE GROUND FLOOR (EXCLUDING CLASS E (G) (III)) WITH ASSOCIATED CAR AND CYCLE PARKING, THE CONSTRUCTION OF A MULTI STOREY CAR AND CYCLE PARK BUILDING, TOGETHER WITH THE CONSTRUCTION OF BASEMENTS FOR PARKING AND BUILDING SERVICES, CAR AND CYCLE PARKING AND ASSOCIATED LANDSCAPING, INFRASTRUCTURE WORKS AND DEMOLITION OF EXISTING STRUCTURES.  
LAND NORTH OF CAMBRIDGE NORTH STATION, MILTON AVENUE,  
CAMBRIDGE, CAMBRIDGESHIRE**

Thank you for your letter regarding the above mentioned site. We have reviewed the information as submitted and wish to make the following comments:

### **Water Resources**

#### **Advice to LPA**

Evidence in the emerging Integrated Water Management Study for the Greater Cambridge Local Plan indicates that groundwater abstraction to meet current needs is already causing ecological damage to Water Framework Directive (WFD)

designated waterbodies (including chalk streams) or there is a risk of causing deterioration in the ecology if groundwater abstraction increases. The area also hosts several chalk streams which are internationally recognised habitats, sensitive to the availability of groundwater baseflow and vulnerable to low flows. This development has the potential to increase abstraction from groundwater sources. You should consider whether the water resource needs of the proposed development alone, and in-combination with other proposed development that the relevant water company is being asked to supply, can be supplied sustainably without adverse impact to WFD waterbodies and chalk streams. At the present time we are unable to advise with confidence that further development will not harm the water environment, until it can be shown sustainable water supplies can be provided.

The Local Planning Authority must have regard to River Basin Management Plans and be satisfied that adequate water supply exists to serve development, in accordance with the policies of the Local Plan.

Should the development be permitted, we would expect you to ensure that the new buildings meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan.

Your authority should ensure that the local Water Recycling Centre has sufficient capacity to accept foul drainage from the proposed development to ensure protection of the water environment including WFD waterbodies.

### **Residential**

The location of this development is in an area of serious water stress (as identified in our report Water stressed areas - final classification). Across East Anglia we are also concerned that the rivers and groundwater, including chalk streams are vulnerable to deterioration under WFD, from groundwater abstraction. As a minimum, the higher standard of a maximum of 110 litres per person per day should be applied to this development as set out in the the Building Regulations &c. (Amendment) Regulations 2015. This standard is already a requirement of Policy Policy CC/4 (Water Efficiency) of the South Cambridgeshire Local Plan, adopted on 27 September 2018 and can be checked by Local Planning Authorities Building Regulations teams for compliance. However, the applicant should consider if a higher standard of water efficiency could be achieved, looking at all options including rainwater harvesting and greywater systems.

Should the development be permitted, we would expect you to ensure that the new buildings meet the highest levels of water efficiency standards, as per the policies in the adopted local plan.

### **Advice to applicant**

Research has shown that it could cost as little as £6-9 per home to reach the more ambitious level of 110l/p/d. In addition, building water efficiency measures into the development will lead to a reduction in water bills.

Using the water efficiency calculator in Part G of the Building Regulations a developer can calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 requirement. The calculator can be found here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/504207/BR\\_PDF\\_AD\\_G\\_2015\\_with\\_2016\\_amendments.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/504207/BR_PDF_AD_G_2015_with_2016_amendments.pdf)

## **Commercial**

The location of this development is in an area of serious water stress (as identified in our report [Water stressed areas - final classification](#)). Across East Anglia we are also concerned that the rivers and groundwater (including chalk streams) are vulnerable to deterioration under WFD, from groundwater abstraction. Therefore, we recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption. This is supported by Policy CC/4 (Water Efficiency) of the South Cambridgeshire Local Plan, adopted on 27 September 2018.

## **Other Comments**

### **Flood Risk / Surface Water Drainage**

Please consult the Lead Local Flood Authority (LLFA).

### **Contamination**

The developer should address risks to controlled waters from contamination at the site, following the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination, which can be found here: <https://www.gov.uk/government/publications/managing-and-reducing-land-contamination>

### **Infiltration Sustainable Drainage Systems (SuDS)**

We consider any infiltration (SuDS) greater than 2.0 m below ground level to be a deep system and are generally not acceptable. If the use of deep bore soakaways is proposed, we would wish to be re-consulted. All infiltration SuDS require a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. All need to meet the criteria in our Groundwater Protection: Principles and Practice (GP3) position statements G1 to G13 which can be found here: <https://www.gov.uk/government/collections/groundwater-protection>. In addition, they must not be constructed in ground affected by contamination.

### **Pollution Prevention**

Any facilities, above ground, for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge into the bund.

Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from lorry parks and/or parking areas for fifty car park spaces or more and hardstandings should be passed through an oil interceptor designed compatible with the site being drained. Roof water shall not pass through the interceptor.

Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking areas and hard standings susceptible to oil contamination shall be passed through an oil separator designed and constructed to have a capacity and details compatible with the site being drained. Roof water shall not pass through the interceptor.

Foul and surface water manhole covers should be marked to enable easy recognition, convention is red for foul and blue for surface water. This is to enable water pollution incidents to be more readily traced.

The Environmental Permitting Regulations make it an offence to cause or knowingly permit any discharge that will result in the input of pollutants to surface waters or groundwater.

Please forward a copy of this letter to the applicant.

Should you wish to discuss this matter further please do not hesitate to contact me.

Yours faithfully

**Neville Benn**

Planning Specialist

Sustainable Places

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