

Greater Cambridge external guidance note for planning applications - Drafted by Environment Agency, March 2023

Water Resources and Growth in Greater Cambridge

Purpose of this guidance

This guidance note is for planning applicants and the Local Planning Authorities (LPA) of Cambridge City and South Cambridgeshire District Councils. It provides advice for major planning applications which are accompanied by an Environmental Impact Assessment (EIA) under the 2017 Environmental Impact Assessment Regulations, including those which have been submitted and are in the process of being determined. The advice focuses on water resources and potential impacts on water bodies in the area. The Environment Agency have prepared this briefing note to help existing and prospective applicants understand the issue and propose and design developments in a way that could allow applications to be supported.

Background

The Environment Agency supports sustainable growth and will seek to work with applicants where concerns are raised.

The Environment Agency has evidence that water bodies in the Greater Cambridge (GC) area are being affected by the abstraction of groundwater which is needed to supply existing homes, business and agriculture. We have conducted investigations that identified a number of water bodies have flows that are failing to meet their ecological flow targets due to abstraction. Further assessment concluded that the ecology was sensitive to flow and abstraction in some water bodies, for example the River Granta and River Cam. There is also wider evidence of abstraction pressure on Chalk streams, river headwaters and spring flows, groundwater dependent wetlands and reduced resilience to dry weather and drought events. There is a risk of compounding these abstraction pressures and potentially ecological deterioration if abstraction increases. Action is needed to prevent environmental deterioration occurring by ensuring abstraction does not increase.



The Environment Agency and the relevant local planning authority must have regard to River Basin Management Plans in exercising their public duties under Regulation 33 of the Water Environment (Water Framework Directive) Regulations 2017¹.

This includes the advice the Environment Agency gives as a planning consultee and the local planning authority in determining planning applications. It is reasonable to expect the local planning authority to be confident it has exercised its planning powers to ensure developments it approves have taken reasonable steps to assess and mitigate the deterioration risk, to comply with Regulation 33.

In November 2021, in our capacity as a regulator, we issued guidance to the water companies on the sustainability reductions to current abstraction licences that would be required to prevent deterioration of water bodies. The reductions in the licensed quantity of water required to prevent deterioration have resulted in significant reductions to licensed headroom available. This means the water company's assessments of water availability in its Water Resources Management Plan 2019 (WRMP19) need to be reviewed and any previous surpluses are likely to be significantly reduced. If this is the case, there are likely to be water deficits until new alternative sources of water are available. The water companies have submitted draft Water Resource Management Plans 2024 (WRMP24), and these will be subject to a period of consultation. We along with other organisations will provide feedback on the plans, and the outcome will influence our position on this issue. Based on current timeframes, we think this will occur mid-May 2023.

Abstraction licence reductions will mean that there is less water available than that reflected in the WRMP19 for Cambridge Water Company (CWC). Consequently, some of the growth included in the adopted 2018 Cambridge City and South Cambridgeshire local plans based on WRMP19 may be reliant on unsustainable sources of water, because the water used for growth risks causing environmental harm. CWC draft WRMP24 was published for consultation on 24 February 2023. Our review of the draft WRMP24 will allow us to assess if the required changes to licences have been included and sufficient water supplies are available for growth and the environment. The assessment of cumulative impacts required for projects falling within the EIA regime should consider the impact on water resources for this development combined with other development coming forward at the same time.

¹ Under regulation 33 of The Water Environment (Water Framework Directive) Regulations 2017:
33. *The Secretary of State, the Welsh Ministers, the Agency, NRW and each public body must, in exercising their functions so far as affecting a river basin district, have regard to—*
(a) the river basin management plan for that district as approved under regulation 31, and
(b) any supplementary plan prepared under regulation 32.

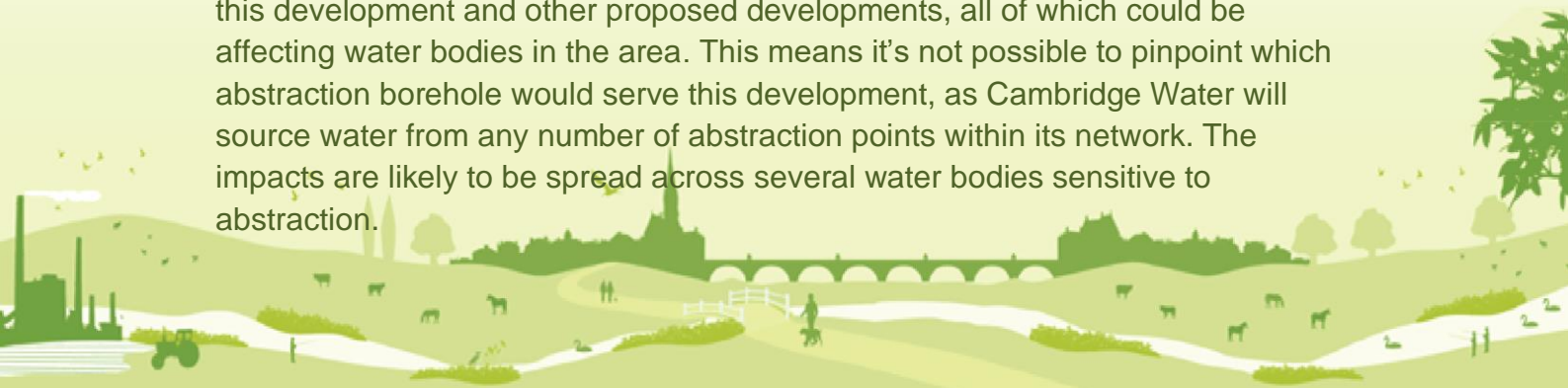
It is likely we will object to current and future planning applications for major development accompanied by an Environmental Statement unless the applicant has undertaken this assessment and demonstrated the risks can be mitigated or removed. We may also remove our objection if the draft WRMP24 demonstrates the water company can sustainably supply growth and prevent deterioration of water bodies, but we will not have sufficient confidence to do this until we have reviewed the draft WRMP24, which we are due to do by 19 May 2023 at the latest. We will make our views public when we have provided our representation to the draft WRMP24 to Defra.

EIA advice

Planning applications accompanied by an Environmental Statement, will be expected to include an assessment of the proposed development's potential impact on water bodies under the Water Framework Directive (WFD), because of the potable water demands. The issue of water availability and potential impact and risks to WFD water bodies from abstraction is broader and strategic in nature compared to other more site-specific constraints such as flood risk, surface water runoff, etc. The impact of the proposed development will need to be assessed in terms of its individual contribution to potable water demand and, it's cumulative impact alongside all other GC developments that require water. Paragraph 5 of Schedule 4 of the EIA regulations provide in part (e) that '*the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.*'

To complete a cumulative impact assessment the applicant will need the LPA to provide information about how much growth is planned versus delivery of sustainable supply by CWC. To do this CWC need to state the amount of water available to support growth up to the capped level and the timing for sustainable alternative water supplies to be in place (for example bulk water transfer or a new reservoir). The Greater Cambridge local planning authorities will need to set this against the overall planned levels of growth up to the point in time that sustainable alternative water supplies come on board to understand the scale of the deficit and the level of mitigation needed to address the shortfall to reasonably manage the risks to water bodies. In providing this information the LPA need to consider the following:

- The study area is the water company water supply zone scale (CWC area of supply). There are several abstraction points across the GC area that may serve this development and other proposed developments, all of which could be affecting water bodies in the area. This means it's not possible to pinpoint which abstraction borehole would serve this development, as Cambridge Water will source water from any number of abstraction points within its network. The impacts are likely to be spread across several water bodies sensitive to abstraction.



- The assessment should be based on the draft Water Resources Management Plan (WRMP24), not the current WRMP19. This is because draft WRMP24 will account for sustainability reductions to abstraction licences required to manage the risk of ecological deterioration following our advice as a regulator issued in November 2021. It is important to be aware that the draft WRMP24 will be subject to consultation and feedback from us as well as other statutory bodies and individuals, which may result in requests for changes to the plan.

The applicant then needs to complete its cumulative impact assessment by:

- Setting out the water needs for each phase of the development and how this compares to available water supply accounting for licence caps and the timing of delivery of alternative supplies and wider demands on water resources from other planned development.
- Identifying appropriate mitigation measures that can be delivered to address the short fall in supplies and minimise the harm to water bodies until the alternative supplies are available. On-site mitigation could include phasing of build out/occupations to align the operational water demand as closely as possible to the alternative supplies, strong water efficiency and conservation measures. We recommend BREEAM 'Excellent' or equivalent for non-residential buildings. For residential buildings we recommend the developer explore the feasibility of achieving water efficiency standards that go beyond the Optional Higher Standard of Building Regulations, e.g., 80 litres per person per day. On-site development level rainwater harvesting systems can provide significant water savings provided they are effectively maintained. We recommend consideration of grey and black water recycling and installation of water meters at site level so that water usage can be effectively monitored.
- To reduce residual demands, where possible, offsetting should be considered, for example, retrofitting other properties/commercial premises with water efficient measures to provide a water saving to balance the residual demand from the proposed development. Off-site mitigation or compensation measures could be explored, for example, contributions/partnership funding towards river restoration projects targeting waterbodies (rivers, chalk streams in GC area) that are suffering the effects of over-abstraction.

When these steps have been taken and the full range of mitigation options have been explored and reasonably applied, we welcome further discussions and the opportunity to provide further advice.



EIA relevant plans/programmes/data and evidence

Summary of WFD evidence

- Our WFD investigations, triggered by waterbody data which can be found on our [Anglian River Basin District, Catchment Data Explorer](#) indicate that:
 - a) A number of water bodies have flows that are failing to meet their WFD ecological flow targets due to abstraction required to meet current needs of the population. Further assessment concluded that the ecology was sensitive to flow and abstraction in some surface water bodies (including chalk streams where applicable); and
 - b) There is a risk of causing deterioration in the ecology if groundwater abstraction increases.

Current levels of water abstraction are affecting the environment in East Anglia. Increase in usage within existing licenced volumes will increase pressure on a system that is already under pressure.

Abstraction licencing reductions are likely to reduce the supplies available to water companies to prevent deterioration of status of water bodies.

Further relevant plans and programmes

- Greater Cambridge Integrated Water Management Strategy, Outline Water Cycle Study [48444 Outline WCS Final - D1 \(greatercambridgeplanning.org\)](#)
- [Greater Cambridge Local Plan – First Proposals \(2021\) – Draft policy direction CC/WE Water Efficiency in new developments](#)
- [South Cambridgeshire Adopted Local Plan \(2018\) – Policies CC/4 Water Efficiency and CC/7 Water Quality](#)
- [Cambridge City Adopted Local Plan \(2018\) – Policies 28 and 31](#)
- [Anglian RBD Part 1 river basin management plan.pdf \(publishing.service.gov.uk\)](#)
- [Anglian river basin district river basin management plan: updated 2022 - GOV.UK \(www.gov.uk\)](#)
- [The state of the environment: water resources \(publishing.service.gov.uk\)](#)
- [Water stressed areas – 2021 classification - GOV.UK \(www.gov.uk\)](#)
- <https://www.gov.uk/guidance/housing-optional-technical-standards>
- [Abstraction licensing strategies \(CAMS process\) - GOV.UK \(www.gov.uk\)](#)
- [Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc \(2021\)](#)
- [Integrated Water Management Home \(oxcamlncp.org\)](#)

This is interim guidance until May 2023 and will reviewed again following the end of the draft WRMP24 consultation period.

