



**Brookgate Land Limited**  
**Land North of Cambridge North Station, Cambridge**

**Summary Proof of Evidence of Alison Caldwell**  
**CEng MICE, MEng (Hons)**

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**PJA**  
Park Point  
17 High Street  
Longbridge  
B31 2UQ  
UK  
[pja.co.uk](http://pja.co.uk)



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## I Qualifications and Experience

- 1.1.1 My name is Alison Caldwell. I currently lead the Water Sector within PJA, a consultancy specialising in the provision of transport planning, engineering and placemaking advice.
- 1.1.2 I hold an Masters Degree in Civil Engineering and I am a Chartered Engineer (CEng) with the Institution of Civil Engineers (ICE), with over 13 years' experience in the field of water.



## 2 Background Information

2.1.1 I address the matters in relation to water, more specifically setting out the updated position with regard to:

- Climate Change (Flood Risk and Drainage)
- Water Resources



### 3 Climate Change (Flood Risk and Drainage)

3.1.1 Cambridgeshire County Council, in their role as Lead Local Flood Authority (LLFA), have objected to the development proposals on the basis of application of climate change allowances.

3.1.2 A supplementary Technical Note (dated 17/04/2023) has been prepared, by PJA, in response to this objection and a meeting held with the LLFA on 19<sup>th</sup> April 2023. A copy of this Technical Note is within Appendix 1 to the Statement of Common Ground with the LPA.

#### 3.2 Updated Position

3.2.1 PJA have undertaken additional works to refine the Surface Water Drainage Strategy and have confirmed that through an increase in provision of surface water attenuation volume the LLFA request for the increase in climate change allowance, in excess of policy requirements, may be accommodated.

3.2.2 It is my view that the information set out in the Technical Note demonstrates that the proposed surface water drainage strategy is capable of being easily updated to cater for the 1% annual exceedance rainfall event with a 40% allowance for climate change allowance across the whole development:

- Without increasing flood risk elsewhere; and,
- Ensuring the development will be safe from surface water flooding.

3.2.3 It was agreed, during the meeting on 19<sup>th</sup> April 2023, and followed with written confirmation from Cambridge City Council, on behalf of South Cambridgeshire District Council, on 25<sup>th</sup> April, that this matter has been resolved noting '*The development proposed is **acceptable** subject to the imposition of the condition(s)*'.



## 4 Water Resources

- 4.1.1 This matter centres on the availability of sustainable 'water resources' (i.e. water supply) to support existing and proposed development within the Greater Cambridge (GC) Area. This is a highly complex, strategic matter encompassing many parties and associated regulatory and legislative processes. With Paragraph 20(b) of the NPPF confirming that water supply is a strategic matter to be addressed through development plans.
- 4.1.2 Water supply is managed and governed by key regulatory and legislative processes, implemented by key parties with associated statutory duties and responsibilities. It is considered that the most important of these processes, is the requirement placed on water companies in England to produce Water Resources Management Plans (WRMP) as set out in sections 37A to 37D Water Industry Act 1991.
- 4.1.3 In this instance, CW's existing WRMP was published in 2019 (WRMP19), with the draft version of its 2024 plan (dWRMP24) published for consultation on 24 February 2023. Since the publication of the WRMP19, and prior to the publication of the dWRMP24, the EA have issued details of licenced reductions associated with groundwater abstraction (i.e. licence caps) to CW which they consider to be a material change in availability of water supply.
- 4.1.4 At present, information regarding the nature, extent and timing for the respective licence caps has not been made available. It is understood that the caps to permanent licences will come into effect in 2030, with caps to licences that have a time limited element being applied at the point of any application to renew those licence conditions, which may be before 2030.
- 4.1.5 The WRMP19 and the dWRMP24 are supported by Strategic Environmental Assessments (SEA), which assess the likely significant environmental effects (including cumulative effects) of the



existing development and planned growth, along with the proposed demand management and supply side options.

4.1.6 As an allocated site within the South Cambridgeshire Local Plan (SCLP), the associated supply and demand of the development proposals have been allowed for within CW's WRMP19 and within CW's recently published dWRMP24.

## **4.2 Updated Position**

4.2.1 Regardless of the strategic nature of water resources, PJA has actively, and positively, engaged with CW and the EA, through a number of virtual and face to face meetings, with the aim of addressing the concerns set out within the EA objection.

4.2.2 It has been confirmed that CW currently operate a complex network which balances abstraction across the entirety of the network. As such, in my view, it is not possible to determine the exact nature and/or extent of deterioration, or risk of, of a specific water body as a result of a specific development.

4.2.3 PJA has undertaken a detailed quantitative assessment, within the Cambridge North Quantitative Assessment (CNQA) (PJA, April 2023), which demonstrates that by introducing further water efficiency and reuse measures the average consumption rate for the residential and commercial buildings, will be far in excess of the current CC/4 policy requirements.

4.2.4 The EA has welcomed, and commended, the CNQA and the development proposals on the level of water efficiencies proposed and the comprehensive and detailed assessment undertaken.

4.2.5 It is my view that the development proposals far exceed the current requirements as set out by local policy and guidance, and in my experience are 'over and above' the typical requirements for





a development of this nature. The proposed water efficiency strategy is ambitious, yet deliverable, ensuring confidence that the measures proposed will be effective in the long term.

4.2.6 Nonetheless, while the development proposals demonstrate significant commitment to mitigate and minimise any potential effects on water resources, in excess of local policy requirements and beyond that typical of a development of this nature and scale, it is understood that the EA remain concerned with the wider strategic issue of water resources and continue to be unable to withdraw their objection without further evidence from CW and the GC Authorities.

4.2.7 It is not disputed that the matter of water resources, in particular with regard to availability of sustainable water supplies, is of a strategic nature. In fact, given the operation of the CW network and the view of the EA that the risk of deterioration of water bodies encompasses the GC area in its entirety, this reiterates the need for a strategic approach to be undertaken by the respective responsible parties.

4.2.8 Given the strategic nature of this matter, it is most appropriate to place due weight and regard for the regulatory and legislative processes, in particular the WRMP and development plan process, to suitably consider and address the potential risk of deterioration to waterbodies within the Greater Cambridge area and rely upon the associated key parties, namely CW, fulfilling their statutory duties.

4.2.9 This issue needs to be viewed in the context of the existing statutory framework whereby CW has a statutory duty under the Water Industry Act 1991 to develop and maintain an efficient and economical system of water supply within its area.

4.2.10 Finally, to provide further context of the potential impact of the development proposals, water demand in the GC area and the quantum of water supply provided by CW, it should be noted that



the development proposals comprise less than 0.22% of the total current (2022/2023) water demand and the proposed (2049/2050) total water demand as set out in the dWRMP24.

4.2.11 Considering that the development proposals comprise a negligible proportion of the overall water demand from CW and the strategic nature of the concerns raised by the EA regarding water bodies across the entirety of the Greater Cambridge Area, it is considered that the development proposals are unlikely to have any likely significant environmental impact in terms of water resources.