

Appeal Ref: APP/W0530/W/23/3315611

Appellant: Brookgate Land Ltd on behalf of the Chesterton Partnership

LPA Updated Position Statement – 15 June 2023

Water Resources

This statement follows the conclusion of the Water Resources Statement of Common Ground (SoCG) dated 22 May 2023 between Brookgate Land Limited on behalf of The Chesterton Partnership ('the Appellant') and the Environment Agency ('the Agency'), which the Local Planning Authority ('the LPA') was not party to.

The LPA submitted a position statement on Water Resources on 23 May 2023, outlining its position at that time.

Subsequent to that statement, the LPA has continued to meet with officers from the Environment Agency, DEFRA and Cambridge Water in an effort to secure resolution of the Environment Agency's broad objection to further development in the Greater Cambridge Area based upon the likely deterioration of water quality.

On 1 June 2023, the Leaders of South Cambridgeshire District Council and Cambridge City Council and the Mayor of the Cambridgeshire and Peterborough Combined Authority wrote to Ministers seeking commitments from the government to the urgent resolution of the Environment Agency's position (Appendix 1).

At the time of writing this statement, the Council has not received a response to that letter. However, its clear position is that resolution of the current environmental risk requires three threads of work to be undertaken urgently.

1. National/regional intervention: accelerate programme for delivery of water interventions

The Water Resources East Regional Water Plan identified several supply interventions which could significantly increase the supply of water available to Cambridge Water.

- i) Delivery of the Fens Reservoir (from 2035/7 onwards)
- ii) Connections between the Cambridge Water supply network and Anglian Water's wider network via a West – East pipeline from Grafham Water (from 2031).

The RAPID infrastructure programme for the Fens reservoir is already underway. However, an application by Cambridge Water to accelerate the delivery of the new water connection from Grafham Water outlined above was recently declined by DEFRA/OFWAT. This decision should be re-visited urgently.

2. Completion of further modelling to understand the cumulative effects of new planned development

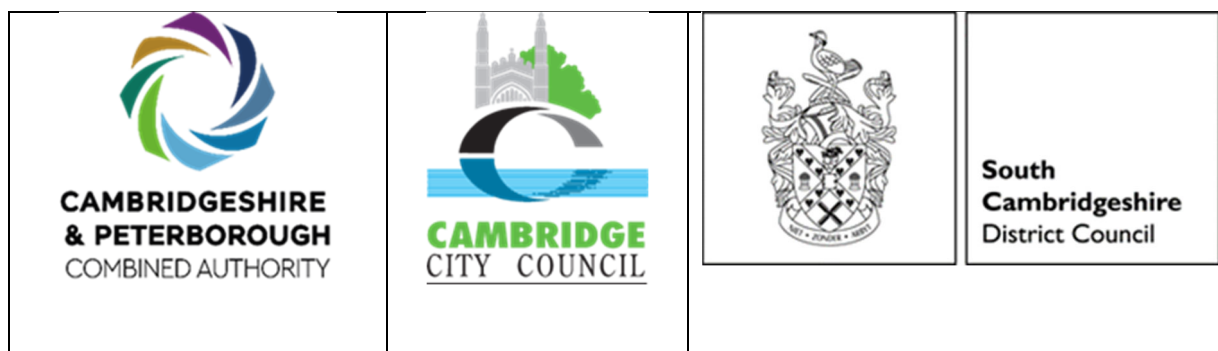
In their response to the draft Water Resources Management Plan the Environment Agency have raised serious concerns. Overcoming their objection requires further modelling by Cambridge Water to be undertaken. This requires the Environment Agency to come together with the water companies and the Local Planning Authority to agree as soon as possible what is to be modelled (assumed new development) in order to inform the water resource planning, local plan preparation and decision making for the area.

3. Options for mitigating the effect/risks of further development to make development applications acceptable

Once clarity on the modelled outcomes and the effects of a range of development and infrastructure scenarios have been identified and modelled, a focus on identifying a robust, effective and deliverable local 'policy' response for the short and longer term is required. Confident planning decisions can only be made with the Water Company, EA and Ministers supporting the development of a local mitigation strategy geared towards managing risks of deterioration and improving the resilience of our chalk streams for the short and longer term.

The LPA is now engaged in a regular meeting with DEFRA's water resources team and has scheduled meetings with Cambridge Water and the Environment Agency during June. The LPA has been advised that further modelling, to inform assessments of the available water supply required is now being undertaken by Cambridge Water, with oversight by the Environment Agency. The LPA is advised that the conclusion of that first phase of work will then allow the LPA and Cambridge Water to review the cumulative effects of new development and its impact upon the water environment, and to give consideration to any available mitigation.

APPENDIX 1 – LETTER TO MINISTERS 01 JUNE 2023



The Rt Hon Jeremy Hunt MP
Chancellor of the Exchequer
By email: pressoffice@hmtreasury.gov.uk

The Rt Hon Michael Gove MP
Secretary of State for Levelling Up, Housing and Communities
By email: correspondence@levellingup.gov.uk

The Rt Hon Thérèse Coffey MP
Secretary of State for Environment, Food and Rural Affairs
By email: newsdesk@defra.gov.uk

1 June 2023

Dear Ministers

Greater Cambridge Economy and the Water Environment

Following the Chancellor's announcements on Friday, 25 May, we are writing to you seeking your assistance in overcoming water supply challenges that risk significantly undermining the Chancellor's and government's economic and environmental objectives. The Greater Cambridge economy is estimated to be worth £30bn annually to the country. Our Councils have already prepared and adopted statutory development plans that envisage continued housing and economic growth across the area. Our latest economic forecasting suggests Greater Cambridge's economy will generate a further 66,000 new jobs over the next 20 years including in sectors such as life sciences where we lead the world. The Councils and the Combined Authority, the institutions, investors and the workers leading that future knowledge intensive growth are also committed to operating to the highest environmental standards.

Against that backdrop, water scarcity and the failure to plan effectively for future water needs, highlighted in earlier letters to Ministers, now represents a significant environmental risk to the fulfilment of our plans for a sustainable future in Greater Cambridge.

Planning applications for over 9,000 homes - in new settlements at Bourn, Waterbeach and on Cambridge's edge - are unable to be determined. Planning permissions for 11,000 jobs (including 300,000 m² of research space for Cambridge University) cannot be issued. A further 380,000 m² of commercial, research and development and lab space projects currently in the pipeline are also now at risk of not progressing. Additional development at the Cambridge Biomedical Campus and life sciences campuses across our area risk being put on hold. Work on the new Joint Local Plan, the area's road map for future jobs and homes, cannot confidently progress to its next stage.

Based upon their assessment of the water companies' future water resource management plan (WRMP) for the area, the Environment Agency has objected to the area's further growth projects until there is greater certainty that these developments will not give rise to deterioration of our environment. With progress slowed on the submission and determination of major planning applications, and plan making being delayed, failure to urgently resolve the areas water scarcity issues will:

- **Significantly undermine the Chancellor's objectives for the area's continued success as a premium UK location for international science and technology investment;**
- **Undermine and/or risk the business cases underpinning the delivery of strategic investment in road (A14 and A428), rail (East-West Rail and Cambridge South Station), and public transport (Greater Cambridge City Deal proposals);**
- **Undermine the government's commitment to plan-led growth by de-railing new homes and jobs on the strategic development sites identified in our adopted local plans;**
- **Prevent the progression of a new Joint Local Plan translating the identified economic and housing need into a spatial strategy that sets out a confident vision for the area to the middle of the century;**
- **Lead to the erosion of the delivery pipeline for new homes and jobs, and adversely impact the Councils' 5-year land supplies.**

What we require **now** is concerted action from Ministers, the agencies of government and the water industry working together with us on the development of short, medium and long term local solutions to the water scarcity issues facing the area. Based upon our exploration of this challenge to date, such action should in our view focus on at least three distinct workstreams:

1. **National/regional intervention: accelerate programme for delivery of water interventions**

The WRE Regional Water Plan identified several supply interventions which could significantly increase the supply of water available to Cambridge Water.

- i) Delivery of the Fens Reservoir (from 2035/7onwards)
- ii) Connections between the Cambridge Water supply network and Anglian Water's wider network via a West-East pipeline from Grafham Water (from 2031).

The RAPID infrastructure programme for the Fens Reservoir is already underway. However, an application by Cambridge Water to accelerate the delivery of the new water connection from Grafham Water outlined above was **recently declined by DEFRA/OFWAT**. This decision should be re-visited urgently.

2. **Clarification of Environment Agency objections**

In their response to the draft Water Resources Management Plan, the Environment Agency have raised serious concerns. Overcoming their objection requires further modelling by Cambridge Water to be undertaken. This has not progressed at pace and there is no clear deadline for completion. There is also no clarity around Cambridge Water's baseline development assumptions for domestic and non-domestic use, preventing the assessment of individual applications and progress on the Joint Local Plan. We urgently need the Environment Agency to come together with the water

companies and the Local Planning Authority to agree as soon as possible what is to be modelled and how it is to be done in order to inform the water resource planning, local plan preparation and decision making for the area. Having recently met with DEFRA officers, we note this work has started but needs to be prioritised.

3. Options for mitigating the effect/risks of further development to make development applications acceptable

Once clarity on the modelled outcomes and the effects of a range of development and infrastructure scenarios have been identified and modelled, collaborative work focused on identifying a robust, effective and deliverable local 'policy' response for the short and longer term is required. Confident planning decisions can only be made with the Water Company, EA and Ministers supporting the development of a local mitigation strategy geared towards managing risks of deterioration and improving the resilience of our chalk streams for the short and longer term. This may include exploring with landowning interests offsetting of water demands from new development with the retrofit of existing commercial estates, or the requirement for more robust water efficiency measures, targeted improvements to river basin catchments and more effective monitoring to shape consumer and occupier behaviour as a requirement of planning permissions.

The Environment Agency have advised that until the outcome of the Water Resources Management Planning process is resolved, and a proper assessment of site specific and cumulative effects from development on the water environment locally can be undertaken, decisions on existing planning projects should not progress. This amounts to a freeze on our plans for the future, and for the many live development projects in the pipeline.

We therefore require a step change in the investigation and commitment from EA/DEFRA and Water Companies to work together with us to enable effective consideration of the cumulative impacts of development and to bring forward agreed interventions as quickly as possible.

Key actions required from government:

1. A commitment from DEFRA/DLUHC to support the swift resolution of the matter amongst their agencies (DEFRA, EA, Ofwat)
2. Re-examine/review the case for the acceleration of the proposed water transfer project by DEFRA/Ofwat
3. Encourage Cambridge Water to properly and fully engage with the LPA and EA/DEFRA to accelerate the necessary modelling and technical work required – including to an agreed response to the comments made to the recent draft WRMP.
4. Commit the EA/DEFRA to work with the LPA and Cambridge Water to develop a methodology for considering/supporting the review of planning applications to enable decision making and the continued provision of pre-application advice to development proposals already in the pipeline.
5. Support the extension of earlier local river catchment studies and associated environmental resilience projects to enable the identification of a programme of effective mitigation works to improve the resilience of the sensitive chalk stream environment to climate change and continued ground water abstraction risks.
6. Endorse a locally specific planning policy framework to cement the potential mitigation strategy developed by partners into planning practice (including on appeal) and thereby enable early local delivery.

The Chancellor's recent announcements on the future strategy for life sciences makes clear the importance of Greater Cambridge to the UK economy. The announcement of a continued commitment to East-West rail echoed this message. Delivering upon this objective will not be addressed by changes to National Planning Practice Guidance and Policy. The Local Planning Authorities for the area, alongside the Mayor for Cambridgeshire & Peterborough, have in fact already recognised the significance of this sector to the UK. Instead, what we need is ministerial commitment to work with us on securing the future of Greater Cambridge as a globally significant place which is at the heart of the UK's economy. Having noted recent engagement from DEFRA on this challenge, we look forward to a meeting with ministers to explore how they can assist in urgently delivering the positive actions outlined above.

Yours sincerely



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