**LAND NORTH OF CAMBRIDGE NORTH STATION, CAMBRIDGE**

**APPEAL REF: APP/W0530/W/23/3315611**

**NOTE FOR INSPECTOR**

**HRA AAP Note**

At the water roundtable on 20 June, reference was made to the Wicken Fen SSSI. Mr Barker confirmed it was a Ramsar site and part of Fenland SAC. He commented that as part of the AAP process, no connection between the Cambridge chalk aquifer and Wicken Fen had been noted (a point also noted in paragraph 4.7.2 of Appendix 1 to the EA letter of 23 May 2023 (CD:13.01)) and that a negative screening opinion was obtained in connection with Habitats Regulation Assessment.

With reference to the HRA Report for the AAP (copy submitted), the accurate position is as follows:

1. For water quantity and quality, as set out in the HRA Report (paragraph 4.56), the evidence was that due to the location of Wicken Fen and the chemistry of the water within it, it was expected that the designated site lies outside of the influence of and, has no connection with, the Cambridge chalk aquifer.
2. However, in the context of the NECAAP, the potential effect on Wicken Fen was screened in on a purely precautionary basis.
3. Appropriate assessment was then carried out. The Report concluded there would be no adverse effect on the integrity of Wicken Fen, nor the Fenland SAC.
4. That judgement was reached on the basis of the expected adoption of the high level strategy WRE Water Management Plan (which informs the more detailed measures in the 2024 Cambridge Water WRMP) and the adoption of appropriate policies in the AAP.
5. The policies considered include for residential development achieving mains water efficiency standards equivalent to 80 litres/person/day and for non-residential development achieving maximum BREEAM credits for water use (see paragraph 5.34).

The same approach is applicable to the current appeal. There is no need for further screening or an appropriate assessment because reliance can be placed on both the strategic regulatory system and on the adoption of appropriate controls.

In particular, the appeal scheme already proposes a stringent water efficiency regime for the scheme (equivalent to 89 l/p/d) and will be brought forward in the context of an adopted WRMP.

In that context, neither Natural England nor the Local Planning Authority considers the appeal scheme is likely to have a significant effect on a European site nor consider an appropriate assessment to be necessary.

The Inspector will note that the emerging Greater Cambridge Local Plan is based on the Integrated Water Management Study (IWMS), which the Local Planning Authority says has shown that 80 litres/person/day is achievable by making full use of water efficient fixtures and fittings, and also water re-use measures on site including surface water and rainwater harvesting, and grey water recycling. The Appellant bears in mind the rapid rate of technological improvement in this area. Should the Secretary of State consider a condition governing water efficiency of the residential units at that level to be necessary, the Appellant would have no objection to it being imposed (eg a change from 89 l/p/d to 80 l/p/d in draft condition 55 (ID: 1.17)). The higher standards of BREEAM water efficiency are already incorporated within the scheme.