

## **Appendix 1: Draft Response to the Anglian Water Draft DWMP Consultation 2022**

Please note: the questionnaire includes tick boxes where a specific answer can be chosen (shown after the questions below) and then a text box where this can be explained. Where it is proposed to choose a specific tick box answer this is stated.

### **Investment Priorities**

#### **Question 1: What are your highest priorities for future drainage investments over the next 25 years?**

**(select up to 3); Asset condition; Enhancing the environment; Pollution; Sewer flooding; Storm overflows; WRC compliance; Don't know. Why do you think this?**

All of the issues are important and a whole systems approach needs to be followed. Given that the Council's ambitions are for a drainage network fit for purpose – including meeting the levels of performance for water management and water quality across the area, the priorities for future investments to achieve this objective is likely to vary over time and it is not possible to prioritise one over another.

Cambridge City Council and South Cambridgeshire District Councils (the Councils) nevertheless consider it imperative that future drainage investment addresses the potentially serious water quality issues facing the Greater Cambridge area. Existing levels of water pollution pose a threat to public health, wildlife and the amenity of the valuable rivers and streams in Greater Cambridge and erodes public confidence in all of the agencies associated with managing future growth of this important area into the future. A focus by Anglian Water on ensuring water is treated to a high standard before it is returned to the rivers in terms of both pollutants and level of nutrients is therefore required.

At the current time, the evidence in the Greater Cambridge Outline Water Cycle Study (2021) shows that the majority of the water bodies in Greater Cambridge are either classified as 'moderate' or 'poor' and none are classified as 'good' (Water Framework Directive classifications, September 2019). It is understood that the Drainage and Wastewater Management Plan (DWMP) is only one part of Anglian Water's investment in the environment and the main actions for this are included within the Water Industry National Environment Programme (WINEP). However, reducing pollution, minimising pollution incidents from storm overflows and as a result improving the water quality should also be a key priority for the DWMP and be implemented as soon as possible. Improvements should be made to the monitoring undertaken and reported for Anglian Water's Environmental Performance Assessment in order to provide clear information in a timely manner on such events,

and their environmental impacts, so the effectiveness of the DWMP programme in the future can be monitored.

Other measures to enhance the environment are also welcomed such as the priority for removing surface water entering the drainage system by the use of sustainable drainage systems (SuDS). SuDS which mimic natural drainage systems have many benefits for biodiversity and also amenity.

The Councils welcome that Anglian Water will be reviewing their work in light of the Storm Overflows Discharge Reduction Action Plan recently published by the Department for Environment, Food and Rural Affairs (DEFRA). Investment in storm overflows and water treatment is vital for protecting river habitats and providing safe bathing waters and needs to be addressed as a matter of urgency in Greater Cambridge.

**Question 2: What are your highest priorities for future drainage investments over the medium term (to 2035)?**

**(select up to 3): Asset condition; Enhancing the environment; Pollution; Sewer flooding; Storm overflows; WRC compliance; Don't know. Why do you think this?**

Following recent publication of data on water quality in the Greater Cambridge area, and wider reported public concerns about the quality of water discharged to the area's rivers, the Councils consider a clear programme of investment in the infrastructure (and management systems) to achieve that objective to be important. What is a priority should reflect a thorough analysis of the causes of recent water quality exceedances in this area, rather than follow a simple categorisation of investment by type. The urgency of resolving this matter for the Greater Cambridge area, may justify a different set of priorities to other parts of the Anglian Water area.

The issues facing Cambridge City Council and South Cambridgeshire District Councils (the Councils) areas is giving rise to considerable public unease about and confidence in the respective authorities' ability to manage planned future growth. Resolution, and engagement with key agencies to share and then implement measures that target and address those concerns needs to take place as soon as possible.

Also, see response to question 1 and question 9. Public concern centres on the recent water pollution posing a threat to public health, wildlife and the amenity of the valuable rivers and streams in the Greater Cambridge area. Given the need to improve water quality, measures such as intermediate targets for removing discharge

of untreated sewage from storm water overflows are needed urgently in the short to medium term.

## Climate Change

**Question 3: We've prioritised planning for a 2 degree increase in temperature due to climate change, where it is cost beneficial to do so over the whole 25 years of the dDWMP. Do you think this is the right assumption to plan against? Should we plan for:**

**No climate change; 2 degree temperature rise; 4 degree temperature rise; Not sure. Why do you think this?**

Answer: 4 degree temperature rise.

The Committee on Climate Change, in their [recent report](#) on understanding climate risks to UK infrastructure noted that it is imperative that climate risk assessments for infrastructure consider potential impacts for the lifetime of their assets under a range of plausible climate scenarios, noting that high quality risk assessments consider both the 2 degree and 4 degree scenario at 2100. In planning for the delivery of key infrastructure, we consider it important to consider the 4 degree temperature rise scenario to ensure robust decision making and apply whole life costings to ensure that all possible measures to climate proof that infrastructure is taken. Our concern with only planning for a 2 degree temperature rise is that in the event that temperatures do rise above this level, this will lead to the need for costly retrofit of infrastructure to ensure that it can withstand such rises. We are of the view that it would be far more cost effective to plan for a higher temperature rise now. Such an approach would also be in keeping with Water Resource Management Plans which are already using the 4 degree temperature rise scenario.

**Question 4: What level of climate change should we be planning to invest against in the medium term (to 2035)?**

**No climate change; 2 degree temperature rise; 4 degree temperature rise; Not sure. Why do you think this?**

Answer: 4 degree temperature rise.

See response to question 3.

## Managing our Investment Approach

**Question 5: We've used local authority data to align our growth forecast with the Water Resources Management Plan (WRMP). Our preferred dDWMP option takes a mid range view of future growth, between a local plan and Office for National Statistics (ONS) forecast. Do you agree with this approach?**

**Use full local plan; Right approach; Use ONS; Not sure. Why do you think this?**

Answer: Not Sure.

It is understood that the DWMP uses committed growth in adopted Local Plans and then ONS forecasting data to cover the period after that. Therefore, for Greater Cambridge this would be the 2018 adopted Cambridge and South Cambridgeshire Local Plans to 2031 and then ONS forecast. Given committed sites will continue development beyond the 2031 period it is important these are also fully considered.

The first results of the [2021 Census](#) shows that the population of Cambridge increased by 17.6% between 2011-2021 and is one of the fastest growing local authorities in England. Growth in South Cambridgeshire District Council increased by 8.9%. Whilst it is recognised that the draft DWMP covers a large region and a standard methodology has been used to reflect future growth, growth in Greater Cambridge may be higher than ONS data. In Greater Cambridge work is progressing on the Greater Cambridge Local Plan which will identify future development needs and how they will be met. The Councils have been engaging with Anglian Water to help inform plan making with regard to waste water infrastructure needs, and it is requested that this process continues so that effective solutions to accommodate development are identified and planned for.

**Question 6: Where it is shown to be cost beneficial we're promoting green solutions, such as sustainable drainage (SuDS) and wetlands. When they are a feasible solution, how much of our plan do you think should implement these green solutions? Where cost beneficial (%); Not sure. Regardless of cost benefit assessment (%); Not sure. Why do you think this?**

The Councils are fully supportive of the use of green solutions such as SuDS and wetlands and believe that these should always be the priority for the plan. These have multiple benefits, particularly where they mimic natural drainage and are at the surface. They are also key to integrated water management. Managing water where the rain falls and allowing infiltration or storage prevents surface water runoff which can lead to flooding and means that less water is being fed through the wastewater drainage system. Rainwater harvesting in this way can then be reused in homes and businesses to flush toilets and water plants, meaning that less water needs to be

abstracted. SuDS and wetlands also have multiple benefits by providing opportunities for biodiversity and amenity areas for residents and also improves the quality of water, such as through filtering in reed beds.

The Councils propose to include policies within the Greater Cambridge Local Plan requiring developers to provide integrated water management including SuDS in new developments. To achieve the levels of surface water removal set out in the DWMP, Anglian Water will also need to retrofit existing development and it would be useful if the DWMP or a subsequent document could provide further detail about how this will be implemented and how other stakeholders will be involved in partnership working to achieve this.

**Question 7: The majority of our long term strategies involve removing surface water from our sewerage system, to reduce the number of flood events, pollutions and overflow spills. Do you agree with this approach?**

**Yes; No; Maybe; Not sure. Why do you think this?**

Answer: Yes

The Councils support the removal of surface water from the sewerage system to reduce flooding, pollution and overflow spills. It is also important that this water is reused given the pressure on water resources in the East of England. As set out in the response to question 6, this removal should be through green solutions such as SuDS, and the multiple benefits of these systems for biodiversity, amenity and water quality should be maximised.

**Question 8: We believe that we can achieve more collective benefits by working with partners and have identified catchments to discuss further. On a scale of 1-5 (with 5 being high), how much do you support a partnership working?**

**Pick 1, 2, 3, 4 or 5 or Not sure. Why do you think this?**

Answer: 5

The Councils support partnership working and request that Anglian Water engage effectively with the Councils, to help inform plan making and the planning application process. Given the challenging water resource situation in the east of England, Anglian Water should continue to explore opportunities for water reuse as part of its wastewater management and engage fully with Cambridge Water who deal with

water supplies in the Greater Cambridge area. The Councils also seek confirmation that Anglian Water are engaging effectively with local bodies to ensure a comprehensive and shared understanding and commitment to the strategy for managing wastewater. This includes bodies such as Internal Drainage Boards, and working to address concerns such as those highlighted around Uttons Drove.

**Question 9: Protecting the environment is important to us. To support our Get River Positive commitment we're re-assessing all of our storm overflows in line with the recent Storm Overflow Action Plan consultation. The costs for managing storm overflows are not in this draft. Where would you expect us to focus first?**

**Protecting bathing waters; Protecting river habitats; Both; Not sure; Other (please explain below). Why do you think this?**

Answer: Both

The Councils consider it to be of paramount importance that investment in the sewer network and water treatment works must be made to prevent untreated sewage discharges from existing treatment works into the rivers and streams in Greater Cambridge. Rivers are important for recreational use and are used for swimming and boating and there is great concern that at the moment this use poses a risk to public health. Investment in storm overflows and water treatment is vital for protecting river habitats and providing safe bathing waters and needs to be addressed as a matter of urgency. This will require engagement at local level with Local Authorities and communities about the investment choices required to realise this objective at a local level.

**Concluding considerations**

**Question 10: We've identified and shared the risks and proposed solution strategies over the next 25 years. On a scale of 1-5 (with 5 being high), how confident are you that the plan sufficiently addresses the risks we face between now and 2050? Pick 1, 2, 3, 4 or 5; And how confident are you that the plan addresses the risks at the right time? Pick 1, 2, 3, 4 or 5**

Answer: 3, and 3

As set out in previous question responses it is important that Anglian Water continue to liaise with the Councils in order that they can plan effectively for planned and future development.

It is noted that the plan includes a series of measures to address future needs including the proposed new Cambridge Water Recycling Centre, and capacity enhancements at other works.

**Question 11: Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to love every drop. Do you believe the draft DWMP meets our purpose?**

**Completely; Mostly; A little bit; Not at all; Not sure. Why do you think this?**

Answer: Not Sure

The Draft DWMP sets out solutions for the whole of the Anglian Water area which is the East of England Region. As a result, the proposed medium and long term plans for each catchment are a succinct summary and do not provide very much detail. For some of the catchments in Greater Cambridge there are ambitious levels of surface water removal of 50% in the long term plans (to 2050). Whilst this ambition is supported by the Councils, further detail on how this will be achieved would be welcomed, particularly in relation to the retrofitting of SuDS. Without this detail and supporting evidence it is hard to understand whether the plan would be achievable.

**Question 12: Do you have any further comments about our draft DWMP?**

This is a complex high-level plan and more detail will be required to understand how it will be implemented. Anglian Water should consider how they can effectively convey this complex information to local communities.

The plan includes measures to increase capacity at Uttons Drove to accommodate development through surface water removal and new permits to increase capacity. The plan also notes that stakeholders are concerned about the implications of flooding in the area. The Councils seek reassurance from Anglian Water that they will identify effective solutions to address such risks and liaise effectively with local stakeholders including Parish Councils and the Swavesey Internal Drainage Board.