

Cambridge City Council and South Cambridgeshire District Council Joint Response to Cambridge Water's Draft Water Resources Management Plan (WRMP) 2024

This response is made on behalf of Cambridge City Council and South Cambridgeshire District Council ('the Councils').

Overview

The water environment of Greater Cambridge, including its rivers and precious chalk streams, are key to the area's environment and biodiversity and the health and wellbeing of its population. The Councils have recognised that we face a climate and ecological emergency, and the state of the water environment is of significant concern for the Councils.

The Councils are in the process of developing the Greater Cambridge Local Plan, which covers both Council geographical areas. Greater Cambridge, along with a small part of Huntingdonshire District Council's administrative area, aligns with the Cambridge Water supply area.

It is essential for the Cambridge Water WRMP to provide certainty that enough water will be supplied for existing homes and workplaces (and those approved under the current Local Plans) in this nationally important economic and water-stressed area, whilst ensuring that this water comes from sources that do not have a detrimental environmental impact. The challenge lies in planning for water supplies for the future developments to be set out in the Greater Cambridge Local Plan covering the period up to 2041, given that any proposals within the WRMP should also provide for real improvements to the water environment as soon as possible.

The Councils note and support the overall aim of the draft WRMP, in that it seeks to address identified development needs whilst also attempting to achieve the abstraction reductions identified as necessary by the Environment Agency to protect the environment, and then seeks to move towards improvements, following the approach set out in the draft Regional Water Resources Plan for Eastern England. The Councils are not the responsible authorities for water resources planning and would look to the expertise of the Environment Agency to assess whether the measures proposed in the Cambridge Water draft WRMP will be effective in providing a sustainable water supply. We nevertheless ask that Cambridge Water continues to work cooperatively with the Councils as the WRMP is finalised. The Councils, as local planning authorities, are already required to have regard in their decision making on planning applications to river basin management plan objectives, including the impact of abstraction to meet water supply needs, and therefore it is essential that we can have confidence in the approach set out by Cambridge Water in the WRMP.

The Councils urge Cambridge Water along with the Environment Agency, DEFRA, DLUHC and OFWAT to work effectively together and in a timely manner to resolve the final WRMP and to bring forward the necessary supply and demand measures as rapidly as possible in such a way that there is no environmental deterioration, and that past ecological damage has an opportunity for repair. We are particularly concerned as, although the wet spring this year will potentially take the region out of “Drought status”, the extreme weather fluctuations that we have seen recently are well in-line with predictions for climate change scenarios.¹ We would like to see the WRMP take a more pro-active approach to the extreme variability in rainfall and weather that is likely to become increasingly normal, and will require a commitment to the precautionary approach.

It is also important to understand the cost of all the proposed measures and the impact this will have on customer bills. Further education initiatives in water usage are encouraged to inform people about the serious water stress in the region. Many people are very unaware, and don't understand the importance of conserving water.

In their public stakeholder engagement webinar about the WRMP consultation, on 13th April 2023, Cambridge Water stated that, between the closure of the consultation (19th May) and the planned date for submission of the revised plan to Defra (25th Aug), they will:

- Update the baseline demand forecast based on the latest property and population forecasts.
- Review [their] demand management profiles to ensure alignment with the Environment Act interim targets.
- Provide more carbon data in the plan e.g. the carbon impact of [their] preferred plan and [their] journey to net zero by 2030.
- Undertake a review of [their] drought triggers.
- Include details and learnings from the 2022 drought.

We have some concerns that the results of these activities will not apparently be made available before the revised WRMP is submitted to Defra, given that many of our concerns itemised below are related.

The Councils' response is structured around the following issues:

- Planning for anticipated development needs
 - Planning for current development
 - Longer term planning
- Measures proposed to enable capacity
 - Demand management
 - Infrastructure provision
 - a. Transfer to Cambridge Water
 - b. Fens Reservoir
 - Drought measures

¹ <https://www.nature.com/articles/s41467-023-36499-9>

- Environmental goals
 - Environmental destination
 - Environmental improvement schemes

Planning for anticipated development needs

It is important that the WRMP properly reflects existing and committed development and seeks to plan for anticipated development needs. Evidence supporting the Draft WRMP indicates that it has taken account of adopted local plans, but also that it has applied an uplift for future development reflecting regional scenarios developed to inform the Water Resources East Regional Water Resources Plan.

Planning for current development

Ahead of the publication of the Draft WRMP, the Environment Agency has raised concerns as a consultee on planning applications (such as Darwin Green, an allocated site on the edge of Cambridge) requiring further information on the basis that the proposed development may, through additional demand for potable water use, increase abstraction and risk further deterioration to water bodies in the Greater Cambridge area. Their comments highlight that the EA will be reviewing the Draft WRMP24, to assess if the required changes to licences have been included and sufficient water supplies are available for growth and the environment. In their 2022 pre-consultation response (in Appendix A accompanying the dWRMP), the EA stated *“the reductions [to abstraction] required are expected to be significant and may cause large discrepancies between the forecast and actual baseline SDB (supply demand balance). We expect the company to demonstrate in its plan that its abstraction is sustainable now and long term. As part of the Chalk Stream Restoration Strategy, we are calling an end to unsustainable abstraction and expect your plan to protect and improve the environment, considering both current and future challenges.”*

The Councils therefore consider it an urgent priority that Cambridge Water and the Environment Agency work together (with other agencies where necessary) in order that there is confidence in the WRMP and to avoid delays to decisions on planning applications on sites allocated in current adopted Local Plans. During the EA Drought Update public webinar of 20th April, the Environment Agency verbally expressed some concern about the abstraction levels in the proposed plan and we would like reassurance that any concerns are being addressed.

Longer term planning

It is important that the WRMP also plans for future anticipated development needs. In January 2023, the Councils agreed updated objectively assessed needs for jobs and homes. This was guided by updated evidence taking account of 2021 census information and evidence regarding jobs growth which showed that Greater Cambridge’s key sectors have continued to see fast growth, even accounting for Covid-19 impacts. The updated evidence showed an increase in the objectively assessed need for jobs and homes compared to that identified in 2021, identifying needs between 2020 and 2041 of 51,800 homes to support 66,600 jobs.

Having identified the needs, the Councils are required to confirm appropriate targets for jobs and homes to plan for in the new local plan, considering a range of potential constraints, as well as economic, social and environmental impacts. The starting point is a requirement in the NPPF to aim to meet the identified needs, to avoid the negative consequences of not meeting them, for example on house prices, long distance commuting, and the important Greater Cambridge economy. Based upon known challenges, key to this will be establishing the amount of water that can be supplied to meet future water demand from sustainable sources without unacceptable harm. If the plan-making process is not to be significantly delayed, it is critical that Cambridge Water, working with bodies such as Water Resources East, the Environment Agency, DEFRA and the Councils identify and agree solutions to deliver a sustainable water supply that also protects and enhances the environment.

Based upon the technical appendices to the draft WRMP, officers believe that the dwellings trajectory that has informed the draft WRMP is broadly in line with the housing development trajectory within the existing adopted Local Plans and the development set out in the Greater Cambridge Local Plan First Proposals (2021), along with growth identified in the published Huntingdonshire housing trajectory for the area within the Cambridge Water Catchment. Following our publication of updated higher needs figures, the revised needs, and their impact upon water demand must be understood urgently.

The information relating to non-household growth accounted for in the draft WRMP is provided in the technical report found at Appendix C2 accompanying the draft WRMP. This indicates that it has taken account of economic trends in different sectors. The Councils however require further information to confirm that the levels of employment growth being used in forecasts are consistent with the evidence being used for the Local Plan, including for the updated needs, in order to give confidence around future decision making. It is important to understand the needs of different sectors such as laboratories, which can be water intensive users, and which are particular to Greater Cambridge.

The Councils understand that the underlying forecasts for household and non-household growth are already being revisited by Cambridge Water as part of the development of the final WRMP. Therefore, it is crucial that Cambridge Water collaborate with the Councils so that the relevant data and evidence base that underpins the development of the new Local Plan can be used to inform this process.

Measures proposed to enable capacity

Demand Management

The Councils are supportive of the demand side management measures set out in the WRMP for both household and non-household uses. Demand side measures provide opportunities to make better, more efficient use of the water available through minimising waste by leakage control, smart metering, re-using water and encouraging individual water-saving behaviour. The effectiveness of these

measures will need to be continually monitored in order to ensure that they are providing the predicted savings.

The Councils question the timetable for universal smart metering by 2035, as the neighbouring water company Anglian Water aim to achieve this by 2030. The Councils firmly believe that this target should be brought forward to at least 2030. There are several ways in which the installation of smart meters can be accelerated, and other water companies (e.g. Severn Trent) have been tackling this far more effectively. The Councils are aware that there have been occasions where single meters have been installed for groups of properties such as flats. The Councils have also taken steps, through conditions in planning consents sought, to ensure that individual dwellings are fitted with the means to monitor and measure their own water consumption. The water company itself should be taking a more active role to ensure that individual properties are metered to deliver the most effective water management.

The Councils are also supportive of the use of site-scale rainwater harvesting and greywater reuse as set out in the draft WRMP in section 9.5.4, under other options. The Greater Cambridge Local Plan: First Proposals (November 2021) included a proposed policy on water efficiency requiring that new housing development should be designed to achieve 80 l/p/d unless demonstrated impracticable. Our Integrated Water Management Study provided evidence to show that 110 l/p/d is achievable by making full use of efficient fixtures and fittings, and that 80 l/p/d can be achieved with the use of water re-use measures on site including rainwater harvesting and grey water recycling. It showed that the cost effectiveness improves with the scale of the project and that a site-wide system is preferable to smaller installations. The largest savings would be at a site-scale, although smaller schemes should also be encouraged as a way for all new developments to reduce water use.

A standard of 80 l/p/d currently goes beyond what Local Authorities are able to require (as set out in the Deregulation Act 2015). In our response to the Regional Water Resources Plan we asked Water Resources East to consider whether the regional plan could support Local Authorities to be able to set more stringent water efficiency policies to reflect their local circumstances. Cambridge, as a centre of excellence for sustainability and the environment, could be a leader in demonstrating how a target of 80 l/p/d can be achieved and we would like the WRMP to reflect this larger ambition. We would therefore welcome assistance from Cambridge Water in lobbying Government to allow for the establishment of more stringent water efficiency policies and in providing evidence to support our aim and show that this is achievable. Southern Water, for example, is working with their customers to reduce personal average daily use to 120 litres by 2025 and 100 litres by 2040.

We are also proposing to include in our Greater Cambridge Local Plan a policy that would require non-household development to achieve full credits for category Wat 01 of BREEAM unless demonstrated impracticable. Again, measures such as rainwater harvesting and greywater recycling will be important to achieve these levels for non household uses, particularly where developments are water intensive uses, for example laboratory uses. Given the known challenges with water supply impacting our area, we would welcome any assistance Cambridge Water could offer to support

this policy, which will also be of benefit to the demand management proposals in the WRMP.

Even if new development is extremely water efficient, it will still lead to an increase in water required. In order to reduce overall demand retrofitting existing buildings to reduce water use will be essential and is urgently required. The Councils would welcome further exploration of how this could be achieved, either on a site/campus or an area wide basis reflecting on best practice elsewhere with officers from Cambridge Water and the Environment Agency. We are aware that there are many options available, from replacing inefficient fittings with new water-saving alternatives to installing water-butts and other water collection devices. The water company should also introduce far more pro-active measures to encourage the public to adopt water-saving behaviour; the efforts made during the 2022 drought were quite clearly inadequate and a critical review of this failure is needed to identify a better approach.

The Councils are supportive of the proposed Government changes to the labelling of white goods and household appliances to show their water efficiency, which is referred to in the WRMP. This should also include the requirement of water usage controls on electric power and rain showers. Given that the national legislation planned will take time to have an effect (households will not automatically replace their existing appliances), the Councils would urge Cambridge Water to lobby the Government to introduce this as soon as possible.

Infrastructure Provision

a. Transfer to Cambridge Water

The Councils support in principle the proposed transfer of water from Anglian Water to Cambridge Water, from Grafham Water reservoir, which is essential to provide additional supply ahead of the Fens Reservoir being operational and which will support the abstraction reductions required by the Environment Agency to protect the chalk streams. The draft WRMP states that following discussion with Anglian Water, both companies have proposed the acceleration of the work, as part of the Defra Accelerated Scheme. If approved this would enable the water transfer to be available in about 2027, rather than 2031. The Councils firmly support the acceleration of this programme, due to its potential in the short term to enable the management of ground water abstraction required to prevent deterioration to the water environment. We urge the water companies, the Environment Agency and DEFRA to complete exploration of the technicalities of delivery of this scheme as soon as possible.

The draft WRMP states that the transfer is time-limited, likely for a 6 year duration. However, once the transfer is operational it is essential that it continues to supply water in the period until the Fens Reservoir is operational (rather than limited to a specific number of years) to prevent environmental impact and the Councils would like this to be clear in the WRMP.

b. Fens Reservoir

The Councils also support in principle the proposal for the Fens Reservoir which is being developed in partnership by Cambridge Water and Anglian Water through the RAPID process and which will provide additional strategic-scale water supply, with half of the water to supply Cambridge Water and half to Anglian Water. The Councils consider making provision for an alternative to groundwater abstraction at current levels is essential for the future growth of the area into the middle of the century. The draft WRMP states that the reservoir ‘could be in supply between 2035 and 2037’. Whilst noting the need for robust regulatory and consenting processes, the Councils therefore support the prioritisation of this essential new infrastructure so that the environmental benefits from reduced abstraction can be realised as soon as possible.

Drought measures

At section 11.3.4, Cambridge Water asks for views on the application of drought measures in the plan in lieu of Regulation 19 exemptions to defer the reductions in licence caps, where there would remain a risk to deterioration of waterbodies. It is unclear from the plan what this would mean in practice and how frequent the use of Temporary Use Bans (TUBs) for domestic properties and non-essential use bans (NEUBs) for commercial activities would be. There is also no detail on how long these restrictions would last, and whether they would no longer be needed once other sources of supply became operational and the plan should be clearer and more specific about this.

The Councils strongly urge the introduction of drought measures, such as TUBs, to stop non-essential use and strongly object to deferring the reductions to abstraction licences and continuing to abstract at levels that would cause damage to the chalk streams and the wider environment. In this way everyone is playing their part in using water wisely. A step change in responsible water use through education and the appeal for restraint communications to the public must be delivered, and we believe that the majority of the public in Greater Cambridge will understand the need for this approach.

The Councils would urge the water companies to use these powers when they are needed to protect the environment in a very timely manner, and introduce them before the negative impacts of a drought period take hold. We would like to understand why such powers were not used at the peak of the heat wave in 2022.

Environmental goals

Environmental Destination

The draft WRMP includes an environmental destination to improve waterbodies by 2040 based on the Business as Usual Scenario (BAU+). This is consistent with the draft WRE Regional Plan, but the Regional Plan makes it clear that WRE’s preferred option is the ‘Enhance’ level even though it proposes using this only from the mid-2030s and subject to further investigations being completed. In line with comments

we made to WRE on the Regional Plan, the Councils believe strongly that given the urgency of the situation and the environmental damage that has already occurred, the WRMP plan must seek to **restore** the status of our watercourse and we are therefore supportive of the 'enhance' environmental destination as a key priority. Given that Cambridge is celebrated as a world centre for environmental research and studies, with extensive expertise among its residents, we urge Cambridge Water to reflect this in its plan and provide a model for other regions in the country. Table 16 of the draft WRMP shows that only the 'enhance' destination includes enhanced protection for our precious chalk streams, sensitive headwaters and SSSIs. We note the challenges associated with the investment required, but we would nevertheless strongly urge Cambridge Water to commit to the 'enhance' environmental destination in the WRMP as BAU+ does not provide adequate protection.

In section 6.10.1 of the draft WRMP it is recognised that further work will be carried out in the next Asset Management Period (AMP) 8 (2025-2030) and that flagship chalk stream river restoration projects will commence during this period. These enhancements are to deliver hydromorphological benefits to the chalk streams to improve and enhance them in the short term, before flows are returned to them in the future. The measures proposed would need to be subject to the appropriate approvals and as a form of mitigation, they are welcomed, but the return of flow to the chalk streams will only be made once the new major sources of supply take effect. Therefore the Councils would again stress the importance of the water transfer and Fens Reservoir in bringing about these improvements and that they are implemented as soon as possible.

Environmental Improvement Schemes

The Councils support schemes to improve the chalk streams and water courses across the area, subject to the appropriate approvals. The Councils have already secured funding from the Cambridgeshire and Peterborough Combined Authority and are starting to carry out partnership projects which make local chalk streams and the species they support more resilient to current low flow scenarios. Both Councils are committed to doubling nature in Greater Cambridge, and we would urge a coordinated approach to actions including with other environmental groups to secure resources and realise the greatest benefits. The Councils would also like to work with Cambridge Water to explore opportunities for water source enhancement through water storage / infiltration to the aquifer, including what could be achieved through the planning process.