

Appendix 2: Draft Uttlesford Local Plan 2021 – 2041 (Regulation 18) Consultation – proposed consultation response

This response to the Regulation 18 Uttlesford District Council's Draft Local Plan Consultation is made by Greater Cambridge Shared Planning on behalf of Cambridge City Council and South Cambridgeshire District Council.

The main points the Councils wish to raise relate to the topic of water stress in the District and the wider area, and the impact that this is having on chalk streams. The Councils are supportive of the recognition of these issues in the plan. The headwaters of the River Cam, the River Granta, flow through Uttlesford District and then into Greater Cambridge, and therefore impacts due to abstraction and from pollution will have a direct impact on water flow and water quality downstream. Water cannot be considered just at a local authority level; water resources management is being considered at a regional level by Water Resources East and Water Resources South East and by the individual water companies in their Water Resources Management Plans (WRMP) (which are considered by the Environment Agency and approved by Defra).

It is not clear whether the overall demand for water resulting from the proposals for growth set out in the Draft Uttlesford Local Plan has been considered in relation to the regional water plans and Affinity Water's latest WRMP24, which is currently being considered by Defra for final approval. The Water Cycle Study (WCS) Addendum (JBA, 2023) accompanying the Local Plan provides little evidence that the level of growth proposed in the Local Plan has been taken into account by Affinity Water in their latest 2024 plan. Section 4.2 and 4.3 of the WCS Addendum refer to the Stage 1 WCS report where Affinity Water 'confirmed there were no 'showstoppers' and the level of development in each case did not pose any concerns'. As the level of growth proposed in the preferred option was one of those presented to Affinity Water, the report therefore assumes that 'their conclusion that the level of growth did not pose any concerns for water supply is still valid'. We were unable to find the Stage 1 report on Uttlesford District Council's website, but the Addendum refers to this being

produced in 2022. The Draft Regional Water Plans were consulted upon in November 2022 and Affinity Water have been updating their WRMP and consulted upon this between November 2022 and February 2023. From our experience in Greater Cambridge, we know that the Environment Agency has imposed tighter restrictions on water abstraction where there is a risk of deterioration to waterbodies such as the chalk streams. Therefore, the Councils would like to be reassured that the level of abstraction required to support the development proposed in Uttlesford's draft Local Plan is sustainable, and suggest that Uttlesford District Council confirm this with Affinity Water in light of their emerging WRMP24.

The Councils would like to work with Uttlesford District Council to ensure that our Local Plans have strong integrated water management policies, with the aim of protecting and enhancing the rare chalk streams in our areas. To support this aim we have the following comments on relevant policies in the draft plan:

- Core Policy 34: Water Supply and Protection of Water Resources
 - The Councils support the intentions of this policy, but consider that it could be more explicit on how a development must contribute to achieving 'good' status and must not lead to a reduction in groundwater levels or flows in watercourses. It is not clear from the policy how it will be applied in practice.
 - On water efficiency, a high water efficiency level for new development will be particularly valuable given that the current average water use in the Uttlesford area is particularly high at 161.27 litres per person per day, as set out in paragraph 9.106 of the plan. Whilst we support the proposed policy approach setting a high water efficiency level of 90 litres per person per day in new residential development, references in the policy to Building Regulations– Part G2 are confusing as they are limited to an optional requirement of 110 litres per person per day. It should be noted that the Councils in Greater Cambridge are proposing a level of 80 litres per person per day in the emerging Greater Cambridge Local Plan. We are currently working with others to provide an evidence base to support this level, and this evidence may in due course also be available to assist Uttlesford District Council. In order to achieve this level of water efficiency, some form of water

recycling such as rainwater harvesting or grey water recycling would be required, but the requirements of Core Policy 34 are not yet clear on this matter.

- Core Policy 34 does not provide any required levels of water efficiency for new non-household developments, which we consider should be added to the policy to make it more comprehensive.
- The benefits of integrated water management in new development could be drawn out more in the plan policies to show the benefits of recycling water on reducing flood risk, and the benefits of SuDS in filtering water to improve water quality. Policy 34 could also seek opportunities for aquifer recharge through appropriate land management.
- Core Policy 35: Chalk Streams Protection and Enhancement
 - The Councils support the intentions of this policy, but further detail will be needed on how this would be implemented. The policy suggests that all development proposals within a river basin of a chalk stream must provide a Chalk Stream Impact Study. The area to which such a Study would apply will need to be specified, together with clarification on whether the policy applies to all developments including minor householder applications.
 - The policy requires that developers should contribute proportionate costs and mitigation of addressing any potential impacts. Further detail would be required about how this would be implemented and whether there are particular schemes of improvement to the chalk streams that such costs could fund. The Councils in Greater Cambridge are undertaking a Chalk Streams Enhancement Project to pilot potential schemes which may provide useful examples.

Aside from the water topic, the Councils previously highlighted the commuting connections between Uttlesford and Greater Cambridge in their response to Uttlesford District Council's Issues and Options First Consultation (November 2020 - April 2021). The Councils value ongoing joint working with Uttlesford on transport issues, including via the Royston to Granta Park Strategic Growth and Transport Study. We note the allocation of an additional 18ha of employment land at

Chesterford Research Park, and would be grateful for the clarification of the transport impacts of this given its proximity to Greater Cambridge, noting that the Transport Evidence Topic Paper and Infrastructure Delivery Plan make no reference to the impact of additional jobs provision on travel patterns or the need for infrastructure. Beyond this we will look to continue engagement with Uttlesford on transport impacts and opportunities as our respective plans progress.

Given the cross-boundary (and indeed global) nature of both opportunities and impacts in relation to the climate and biodiversity emergencies, the Councils support the ambitious climate and biodiversity policy approaches set out in the Uttlesford draft plan, including Core Policy 40: Biodiversity which requires development to demonstrate a minimum of 20% net gain in biodiversity. This approach mirrors the Greater Cambridge First Proposals policy approach seeking 20% biodiversity net gain.

In conclusion, as neighbouring authorities to Uttlesford and noting that further work will need to be undertaken to prepare the emerging Greater Cambridge Local Plan, both Cambridge City and South Cambridgeshire District Councils look forward to the continued engagement with Uttlesford District Council on our respective plan-making processes regarding strategic cross-boundary matters of shared interest, including but not limited to the issues identified in the above response.