

Planning Policy Team
Greater Cambridge
PO BOX 1493
Cambridge
CB1 0YR

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Your ref:
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Dear Planning Policy Team

PUBLIC CONSULTATION ON DRAFT CAMBRIDGE BIOMEDICAL CAMPUS SUPPLEMENTARY PLANNING DOCUMENT

Thank you for consulting us on the Cambridge Biomedical Campus Supplementary Planning Document. We have reviewed the draft document and wish to make the following comments.

Flood Risk

The Cambridgeshire Flood and Water SPD is referred to in section 4e Sustainability. Although most of the guidance in this document on how to manage flood risk is still relevant, the climate change allowances included in section 5 are out-of-date. The most recent guidance on using climate change allowances in FRAs can be found at: [Flood risk assessments: climate change allowances - GOV.UK](#)

There is no mention of flood risk under the 'Key principles for sustainability' heading on pages 37-38 and there are no questions relating to flood risk under the sustainability heading on page 44. Flood risk should be an important consideration for any new development in the area given that there are some areas of Flood Zone 3 (high risk) within the preferred site options. As such, flood risk considerations should be included in the sustainability section of the SPD. We would like to see reference to avoiding new development in any areas at risk of flooding and seeking opportunities to reduce flood risk both on site and elsewhere.

The SPD should make it clear that if any development is proposed within sites that include areas of Flood Zone 3, hydraulic modelling of relevant watercourses will need to be undertaken as part of a site-specific Flood Risk Assessment (FRA). As no detailed modelling is available in this area, modelling should be undertaken as part of an FRA to define the extent and depth of any fluvial flooding, to ensure a sequential approach is taken to the site layout, and to inform the design of any mitigation measures such as the raising of finished floor levels.

Water Resources

We support the inclusion of water use in the key principles of sustainability. This location is in an area of serious water stress ([as identified in our report Water stressed areas – 2021 classification](#)) and has the potential to increase abstraction from groundwater sources. We have evidence which indicates that groundwater abstraction to meet current needs of the population is already in some cases causing ecological damage to Water Framework Directive designated waterbodies or there is a risk of

causing deterioration in the ecology if groundwater abstraction increases. Therefore, the water resource demand of the development should be considered. This supply needs to be sustainable and have no adverse impact to WFD waterbodies including chalk streams.

We encourage grey and rainwater harvesting policies for new developments, designed at an appropriate scale and potentially determined on a case-by-case basis. These could help to create places resilient to climate change, contribute to achieving NZ emissions and reduce the demand for water. Systems must be reliable for users and so their impact can be accounted for in water resources and flood risk management plans. Further information is available from [Waterwise](#) which has shown that the policies to encourage grey and rainwater harvesting for new development have the most net benefit and we support this position.

SuDS

The Biomedical Campus is situated above a Principal Aquifer.

We recommend the use of Sustainable Drainage Systems (SuDS). These techniques can provide a method for reducing runoff that could otherwise lead to flooding. They can also minimise pollution impacts, improve biodiversity and provide amenity areas.

Where infiltration drainage is proposed, it must be demonstrated that it will not pose a risk to groundwater quality. Infiltration should not be focused in areas where ground contamination has been identified. Surface water infiltrating through contaminated ground can mobilise contaminants and result in pollution of the groundwater. Where necessary, we will seek to control the depths of soakaway systems by recommending maximum penetration depths and a requirement that the water table should not be intersected. In general, groups of shallow soakaways are preferable to one or two deep boreholes.

Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater. For the immediate drainage catchment areas used for handling and storage of chemicals and fuel, handling and storage of waste and lorry, bus and coach parking or turning areas, infiltration SuDS are not permitted without an environmental permit.

Please note that we cannot issue an environmental permit for the direct discharge of hazardous substances into groundwater.

Further guidance can be found in the updated [CIRIA SUDs manual](#), and the pollution prevention advice for businesses at [gov.uk](#).

Preparation of planning applications

Should applicants wish us to review any technical documents or want further advice prior to the submission of planning applications, we may do this as part of our charged for planning advice service.

Further engagement will provide the applicant with certainty of our position as to what our response to your planning application will be. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per

hour, plus VAT. We will provide the applicant with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available [here](#).

If you would like more information on our planning advice service, including a cost estimate, please contact us at Planning.EastAnglia@environment-agency.gov.uk.

We hope this information is of assistance. If you have any queries, please do not hesitate to contact us.

Yours faithfully

Ms Alison Craggs
Sustainable Places Planning Advisor

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