



Greater Cambridge Shared Partnership  
South Cambridgeshire Hall 6010  
Cambourne  
CAMBRIDGE  
CB23 6EA

**Our ref:** AC/2025/133203/01-L01

**Your ref:** Draft Greater Cambridge  
Local Plan

**Date:** 30 January 2026

Dear Sir/Madam

## **DRAFT GREATER CAMBRIDGE LOCAL PLAN FOR CONSULTATION**

Thank you for the opportunity to comment on your Regulation 18 Draft Local Plan. We have reviewed the Local Plan in conjunction with the associated supporting documents. We have provided comments and recommendations below which align with the various constraints within our remit. We appreciate the opportunity to engage with you on the Local Plan Review and look forward to ongoing engagement as the review progresses.

In addition to our comments on the Local Plan, we also attach a copy of our Cambridge Waste Water Treatment Works (WWTW) Environmental Position Statement – Version 4. This position statement provides bespoke information, relating to the ongoing challenges at the Cambridge WWTW around capacity and any growth implications within this catchment. It also sets out additional advice in relation to planning application decision making, plan making and evidence base water cycle study (WCS) considerations. It should be read in conjunction with our comments on water quality and waste water below. It can continue to be referenced by your planning authority moving forwards, and we will communicate any updated versions as they become available.

### **Policy Specific Comments**

#### **Development strategy**

##### **Policy S/DS: Development Strategy**

We note in the policy's Supporting Information on "Ensuring a deliverable plan" mentions "Development at new strategic sites including North East Cambridge, Cambridge East, Cambourne, and Grange Farm, is not anticipated to be completed in the housing trajectory accompanying the Local Plan until 2032 when a new pipeline connection to the Cambridge water zone is anticipated to be operational."

We would recommend the statement "is not anticipated to" to be improved by including further information from developers of the strategic sites on their planned phasing. Currently, Table 2 highlights Allocations for the periods 'Homes 2024-2025' and 'Homes Post 2045'. We recommend this table be revisited and an additional column be added which details new local plan allocations for 'Homes 2024/25-2031/32' and 'Homes 2032/33-2045' (or any further breakdown, that reflects

when water supply is planned to be available from other strategic schemes like the Fens Reservoir).

We are encouraged by the statement “Delivery and phasing plans will need to demonstrate engagement with the water industry, and respond to the availability of water supply improvements.” and would recommend including this wording to this policy or to policy CC/WE. See also further comments on policy CC/WE below.

Paragraph 2.86 appears to be missing the word ‘waste’ before ‘water treatment works’, in the first sentence. We recommend being clear throughout the Plan when referring to Waste Water Treatment Works, to avoid confusion with Water Supply Treatment Works, which are commonly referred to as just water treatment works.

### **Policy S/SH: Settlement hierarchy**

We recommend the addition of the following wording at the end of points 1 and 3:

‘Residential development and redevelopment.....provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development *and areas of flood risk are avoided.*’. Please see our further comments in respect of flood risk, below.

## **Climate Change**

### **Policy CC/SD: Sustainable development and the climate emergency:**

We welcome this policy and the requirement for Sustainability Statements to be submitted for major development proposals. In particular, we support the requirement for statements to include how water management has been considered in an integrated way which protects and enhances water quality and the reference to the use of ‘nature-based design solutions’ in point 2.

We recommend adding the following wording to bullet 8 on what a Sustainability Statement should include:

‘Demonstrate that flood risk from all sources has been avoided or managed *if it is not possible to sequentially locate all development outside areas of flood risk.*’

### **Policy CC/WE: Water efficiency in new developments**

We are pleased to see an ambitious water efficiency policy and would encourage Greater Cambridge Shared Planning (GCSP) to commit to monitoring reports which will give periodic updates on the policy’s effective implementation. We would like to highlight the following to improve the policy’s effectiveness:

Part 1: We would encourage the wording to be changed from “adequate” to “sufficient and sustainable”.

Part 2:

- a) We support the enhanced ambitious 80 l/p/d policy. We note that, according to the Greater Cambridge Integrated Water Management Study Detailed Water Cycle Study (Stantec, October 2025), these figures were proven to be deliverable based on the Integrated Water Management Study from 2021 This was quoted

as “being consistent with national policy” in the Policy Review of the Adopted Local Plans for Greater Cambridge (June 2023). The 2023 written ministerial statement also encourages local authorities to seek tighter standards in water stressed areas. We recommend GCSP review its 2021 evidence base in light of additional evidence provided in the Shared Standards for Water Efficiency and to include this within its policy’s justification to improve its future soundness at later examination stages.

- b) We would like to suggest the wording “subject to amendments to relevant water legislation” be amended to “subject to amendments to relevant water re-use policy”. Moreover, please clarify to what degree the water re-use and recycling expectation is dependent on amendments to relevant water legislation occurring and what the implications would be on the policy’s effectiveness if this reform does not occur.
- c) We are encouraged to see a high standard being promoted for non-household development. Regarding the phrasing “unless demonstrated not practicable”; we strongly encourage GCSP to define how “non-practicable” will be assessed. We would also encourage a minimum of 3 credits for Wat 01 where 5 credits cannot be achieved, as per the Shared Standard.
- d) Please clearly state whether point d applies **in addition to point c** for non-household developments which use as part of a commercial process(es).
- e) “should consider” to be changed to “must consider” to further the policy’s application.

We also recommend the inclusion of a section dealing specifically with Data Centre’s water efficiency as these are an emerging sector with a high-water consumption. We have provided additional comments in our section Comments on the Cambridge Area Water Supply Evidence (October 2025) part 5.5 Future for non-household demand.

We would encourage wording in the policy’s justification (“Where Government policy or legislation relating to water efficiency is more stringent or at significant variance with this policy in the future, the more stringent standard will be adopted when determining planning applications.”) to be transferred as an additional point to the policy.

In respect of groundwater, we are glad to see that Policy CC/WE mentions the importance of groundwater as a vulnerable resource for drinking water and highlights the need for improved water efficiency as a way of protecting groundwater.

We would recommend the inclusion of the following comments in relation to aquifers and source protection are added to the supporting text. These considerations can be useful to guide decisions regarding development and water availability:

- Bedrock geology consists of the following from the northwest to the southeast of the district: Woburn Sands Formation Sandstone, Gault Formation Mudstone, West Melbury Marly Chalk Formation, Zig Zag Chalk Formation, Holywell Nodular Chalk Formation and New Pit Chalk Formation. The Sandstone and Chalk deposits are classified as Principal aquifers and the Mudstone is classified as Unproductive Strata.
- The Principal Chalk aquifer supports many groundwater abstractions for public water supply. Source Protection Zones (SPZs) surround these abstractions and

extend across the majority of the southwest of the district. The SPZs show the level of risk to the protected source from contamination and contaminative activities and are used to guide decisions about the acceptability of potentially polluting development scenarios.

- Superficial deposits of Oadby Member, Lowestoft Formation, River Terrace Deposits and Alluvium are present across the district. These are classified as Secondary aquifers. Secondary aquifers can support local water supply and may also provide an important source of base flow to rivers. There are also large areas with no superficial geology.
- The aquifers that underly the area support abstractions for public water supply, agricultural, industrial, commercial, public services and private/domestic water supply. The groundwater resource is therefore of high value.

We also recommend that the following guidance be referenced: The [Groundwater Protection](#) guidance on gov.uk which includes the [Protect Groundwater and Prevent Groundwater Pollution](#) guidance and [The Environment Agency's Approach to Groundwater Protection](#). Our guidance is regularly revised, and therefore developers should be reminded that the most recent version or replacement guidance for superseded versions should be consulted.

### **Policy CC/IW: Integrated water management, sustainable drainage and water quality:**

#### Waste Water

We generally support the draft policy wording, particularly given that many of the waste water treatment works (WWTW) in the Greater Cambridge area are already at or close to capacity (as identified in the Greater Cambridge Integrated Water Management Study: Detailed Water Cycle Study, October 2025 – Revision C). Wording around the conveyancing infrastructure (within part 6.a. of the policy) should be tightened to ensure that it is not just 'adequate', but that there is sufficient capacity in any existing conveyancing infrastructure that the new network might connect into. This is important to protect the water environment from increased storm overflows (from combined sewers, or at pumping stations), or from flooding of manholes on the wider, existing sewer network.

We welcome the distinction between capacity for waste water treatment and also adequate waste water conveyancing infrastructure, as stated in 6a. However, defining and differentiating between separate capacity considerations can often be confused, and we regularly see information submitted within planning applications failing to address all aspects of waste water capacity. We recommend that the supporting text section includes a paragraph to capture these nuances. For example, wording such as,

- "There will be changes to WWTW capacity throughout the lifespan of the local plan and therefore development applications should individually confirm an up-to-date capacity assessment at WWTW with Anglian Water Services Limited (AWS) and not just rely on the WWTW data and assessments identified in the WCS. When reviewing waste water capacity, it is important to distinguish between different 'capacity' considerations. Sewer network (ie conveyancing infrastructure); on-site treatment infrastructure and permitted volumetric discharge capacity at a WWTW are all independent considerations. Applicants for development proposals should engage early with AWS to understand whether there is available capacity within

the sewer network to accommodate connections, and capacity within the on-site WWTW infrastructure to treat the flows received through the sewer network, as well as the permitted volumetric discharge capacity, to serve their development in line with any phasing requirements. Capacity, in the context of waste water, is both complex and multifaceted. There may be capacity in the network but not treatment capacity and vice versa.”

- If sufficient waste water infrastructure capacity is unavailable at the time of planning application submissions, risk to the environment from the development combined with wider planned growth could be mitigated by using a condition to delay occupation of the development until it can be evidenced that the anticipated additional net increase in waste water generated by the development is capable of being accommodated by the receiving WWTW to protect water quality and support the achievement of water quality objectives.

We support the text in Policy CC/IW para 7, which outlines that foul drainage should connect to public sewers (Mains) wherever possible. It would helpful be to expand on this further within the supporting text section to clarify guidance on non-mains drainage.

For example:

- National planning practice guidance establishes a first presumption for development to discharge wastewater via the mains system. This is set out in the wastewater drainage hierarchy in Planning Practice Guidance ([Water supply, wastewater and water quality - GOV.UK](#) - paragraph 020 ID: 34-020-20140306), and ensures consistency with environmental permitting and building regulations requirements.
- Private sewage treatment facilities should only be used where it is not feasible for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems. Lack of capacity or plans to improve capacity in the sewer network or waste water treatment infrastructure is not a valid reason for a development to install a private sewerage system. The applicant should explore how a lack of capacity may be overcome so that their development can be connected to a public foul sewer. In these cases, if an applicant decides to apply to the Environment Agency for a water discharge permit for private treatment facilities, it is unlikely that a permit would be granted.
- Proposed developments should only include non-mains drainage if it can be demonstrated that a mains connection is not feasible in terms of cost and/or practicality. The Building Regulations 2010 and Government Guidance contained within the [PPG for Water Supply, Wastewater and Water Quality](#) (paragraph 020 ID: 34-020-20140306) sets out a hierarchy of drainage options that must be considered and discounted in the following order:
  1. Connection to the public sewer
  2. Connection to a private sewer that drains to a public sewer
  3. Package sewage treatment plant or septic tank
  4. Cesspool

### Sustainable Drainage Systems (SuDS)

It should be noted that whilst we support infiltration drainage as a way to promote aquifer recharge and reduce flooding, there are risks associated with installing

infiltration SuDS in areas of contaminated land. We would recommend the inclusion of the following comments within the supporting text to the policy and a summary of the position within part 4 or 5 of the policy:

Soakaways and other infiltration SuDS must comply with statements G1 and G9 to G13 of our [Groundwater Protection Position Statements](#). They should be constructed in line with good practice and guidance documents including the [CIRIA C753](#) SuDS Manual and the [Susdrain website](#). They must not be constructed in contaminated ground where infiltration could re-mobilise contaminants to pollute groundwater. All infiltration SuDS should be designed to maintain a minimum 1.2m clearance above peak seasonal groundwater levels. We do not consider deep infiltration systems (>2.0m below ground level) to be routinely acceptable. Only clean roof water can be directly discharged to infiltration SuDS or watercourses. Systems for the discharge of surface water from hard-standing, roads and impermeable vehicle parking areas must incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment components in line with the environmental sensitivity of the receiving waters.

We also support sections 1.a and 1.b. and 4.d for a whole development scale strategy for integrated water management from the earliest opportunity. This will help ensure the most efficient use of land and resources in a way that co-benefits biodiversity and amenity. For example:

1d. the requirement that water management must be '*designed in such a way that makes use of nature-based solutions wherever practicable*'.

3, 4. and 5. Reflecting aspects of the drainage hierarchy and standards from the national SuDS standards – although we acknowledge that the Lead Local Flood Authority will lead on advising which are the most pertinent aspects for Greater Cambridge. We advise that the water re-use and infiltration aspects are crucial to protecting groundwater resources and taking pressure off the Fens where fluvial waters will, over the coming decades, be decreasingly able to discharge by gravity discharge into a rising sea level. We welcome the recognition of this challenge in the supporting information.

### **Policy CC/FM: Managing Flood Risk**

- Should be expanded to include reference to the need to consider the impacts of climate change and all sources of flood risk when applying the sequential and exception tests. We recommend rewording this to: '*...having regard to actual and residual flood risks from all sources and taking into account the impacts of climate change*'. This would be in line with the recommendations of the Level 1 SFRA. Paragraph 174 of the NPPF states that the sequential test should be used in areas known to be at risk of flooding now *or in the future from any form of flooding*.

The wording in brackets should be caveated as the exception test may need to be reapplied at the planning application stage – e.g. if evidence on flood risk has changed significantly or the nature of the development differs significantly from the nature of the allocation (see paragraph 180 of the NPPF).

- We support part 1b as it requires a sequential approach to be taken to the site layout, avoiding any areas of flood risk.

- We support the reference to reducing flood risk overall where possible in 1c. However, we would like this to be expanded to include reference to the use of natural flood management techniques, as detailed below.
- In respect of 1d, the safety of access / egress routes should be defined – i.e. Is a dry route of escape required or is some depth of flood water along the route acceptable? This point should also clarify when emergency plans need to be provided.

### **Recommended Additions to Policy CC/FM**

- **Natural Flood Management (NFM)** – we recommend that reference is made to the need for development proposals in flood risk areas to demonstrate that all reasonable opportunities to use natural flood management techniques or nature-based solutions to reduce flood risk overall have been considered and taken, in line with paragraph 172 of the NPPF.
- **Hydraulic modelling** – we recommend that the policy makes it clear that where hydraulic modelling of a watercourse within or adjacent to a site is not available or is out-of-date, modelling may be required as part of a site-specific FRA to define the extents and depths of fluvial flood risk at the site. This will help ensure FRAs include sufficient evidence to ensure a sequential approach is taken and to inform any proposed mitigation measures to ensure the development will be safe for its lifetime.
- **Development in the undefended floodplain** – we recommend the policy clarifies that any development in the floodplain (i.e. within the 1% annual probability flood extent, including an allowance for climate change) that is considered acceptable must not decrease flood storage capacity or impede flood water flows. See draft policy LP13 of the draft Hunts Local Plan for suggested wording.
- **Residual risk** – we recommend clarifying that if development is proposed within areas benefitting from flood defences, the FRA should assess the residual risk of a flood defence breach or overtopping and breach analysis or modelling may be required where ‘more vulnerable’ development is proposed.
- **Change of use** – we recommend that the policy clarifies the Council’s position on change of use applications in flood risk areas. The PPG recommends that Local Plans outline where change of use applications will be acceptable. These applications are excluded from the sequential and exception test but may still involve an increase in flood risk, either due to an increase in the number of properties in flood risk areas or an increase in the flood risk vulnerability classification. We recommend that appropriate restrictions are placed on change of use applications for sites within Flood Zones 3b and 3a, and within areas of high surface water flood risk, where ‘more vulnerable’ basement or ground floor uses may not be appropriate.

### **Policy CC/CE: Supporting a circular economy and sustainable resource use**

We note the inclusion for developers to consider waste management for all proposals. However, there is a lack of detail on post-development household waste management including Persistent Organic Pollutants, hazardous or problematic waste streams and the support of the circular economy. Reference should be included on how future

growth will be supported by adequate infrastructure such as Household Waste Recycling Centres, recycling hubs, Waste Treatment Stations, Incinerators and treatment capacity.

It has been noted that water scarcity is a concern for the local plan, please note that water is generally required alongside waste operations for the purpose of dust suppression and fire prevention. This would need to be considered in relation to any waste management infrastructure required as per the point above. It may also be required by constructors for dust suppression during building works.

Please ensure that Contractors are aware of the potential requirement to obtain Waste Permits and/or apply under DoWCoP in relation to construction waste.

We would recommend revision to reflect the following comments for waste management in the context of land contamination/remediation: Excavated materials recovered on a development site via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP) subject to certain conditions being met. This is sustainable approach. However, contaminated materials that are or must be disposed of are waste and must be managed in accordance with the relevant legislation.

We recommend that the following guidance be referenced: The [Definition of Waste: Development Industry Code of Practice](#); and The [Waste Management](#) page on gov.uk.

## **Biodiversity and green spaces**

### **Policy BG/BG: Biodiversity and geodiversity**

We recommend the inclusion of a clear requirement for biosecurity measures to prevent the spread of invasive species. Development proposals must demonstrate implementation of recognised protocols such as 'Check, Clean, Dry' to minimise the risk of transferring invasive non-native species. This aligns with national biosecurity best practice.

In relation to Long-Term Management and Monitoring while the Local Plan acknowledges the need for 30-year management agreements for biodiversity net gain (BNG) sites in the Biodiversity and Green Spaces Topic Paper section 3.40, this requirement should be broadened and made explicit for all biodiversity enhancements, not just those linked to BNG. The Local Plan should require developers to submit a funded Habitat Management and Monitoring Plan (HMMP) for every habitat creation or enhancement measure. Funding must be guaranteed upfront to cover maintenance, monitoring, and reporting for a minimum of 30 years, ensuring ecological integrity and compliance over the long term.

### **Policy BG/GI: Green and Blue Infrastructure**

We support this policy but would like to see specific reference made to the potential for green and blue infrastructure to reduce flood risk. We suggest expanding part 2.d. as follows:

*'d. Resilient – responds to the climate emergency in a positive, contributory way, reducing flood risk where possible.'*

### **Policy BG/RC: River corridors:**

We welcome the inclusion of this policy and are generally supportive of the wording. However, we recommend the inclusion of an additional bullet point under part 2. to ensure there is no cumulative loss of floodplain storage due to development within riparian buffer zones, which could increase flood risk elsewhere. We suggest using the following wording: '*d. that there will be no loss of floodplain storage or impedance to flood water flows.*'

## **Wellbeing and social inclusion**

### **Policy WS/HS: Pollution, health and safety**

The requirement to manage contamination during the development of new sites, particularly those with previous industrial and commercial land uses, is incorporated within this policy. Your Local Authority is responsible for identifying and inspecting potential contaminated land sites in their area. We would recommend greater emphasis and encouragement for the redevelopment of land affected by contamination as this is a sustainable approach which provides an important opportunity for environmental improvement via remediation.

The Plan includes details of the intended development of several sites which have the potential to be contaminated. We are pleased to see these included and that Plan highlights the necessity for soil and groundwater investigations and mitigation of any contamination prior to development. Any development proposed on brownfield sites, historic landfill sites, or sites suspected to have been affected by contamination, should follow the requirements of our [Land Contamination Risk Management \(LCRM\) guidance](#). This would initially require a Preliminary Risk Assessment, which would likely be followed by intrusive site investigation, and potentially detailed quantitative risk assessment to assess whether remediation can be undertaken to ensure the protection of the surface water and groundwater environments.

We recommend that the following guidance be referenced: Paragraphs 123, 146, 180, 189 and 190 within the [National Planning Policy Framework \(NPPF\)](#); Part IIA of the [Environmental Protection Act 1990](#); The [Land Contamination Technical Guidance](#) on gov.uk including the [Land Contamination Risk Management \(LCRM\) guidance](#). Our guidance is regularly revised, and therefore, throughout the plan's duration, the most recent version or replacement guidance for superseded versions should be consulted.

## **Great Places**

### **Policy GP/QP: Establishing high quality landscape and public realm**

We support the inclusion in The Local Plan the requirement to use native species in landscaping. We recommend that should anyone proposing to plant species as part of development submit a planting schedule that specifies species native to the area and sourced locally to maintain genetic integrity and ecological resilience. The schedule should also include details of establishment care, such as watering and maintenance, to ensure successful growth and long-term survival.

## **Homes**

### **Policy H/DC: Dwellings in the Countryside**

We recommend that the 'Reuse of buildings in the countryside for residential use' section of this policy refers to the need to place restrictions on changes of use within flood risk areas (see comments under policy CC/FM, above). The following bullet point could be added to this section :

*'The buildings are located outside of Flood Zones 2 and 3 and outside areas of high surface water flood risk, or a site-specific Flood Risk Assessment demonstrates that the development will be safe for its lifetime, taking into account the effects of climate change.'*

### **Policy H/GT: Gypsy and Traveller pitches and Travelling Showpeople plots:**

We have previously encountered issues in relation to foul sewage disposal at the permanent traveller sites in the area. These sites are not connected to the mains foul sewage system, instead utilising multiple package treatment plants that produce inadequately treated final effluent. Consequently we regularly receive reports of pollution to the River Cam and its tributaries. We are pleased to see that section 2(f) includes the need for provision of essential utilities including drainage and sewerage (for both allocated and unallocated sites). However, we are unclear if the term 'essential utilities' refers to 'mains' sewerage. Please confirm. As stated in our previous response, (AC/2021/130671/01, dated 13 December 2021) it is preferable that this policy should provide for 'mains foul drainage' where possible, and as set out in the current South Cambridgeshire Local Plan 2018 Policy H/23 and 7.99. The new draft policy does also not include any reference to situations where connection to a public foul sewer is not feasible, and we expect wording around these situations to be included for the next stage of the draft Local Plan.

We would welcome working with the local authority and Anglian Water to establish if/when the land is redeveloped, the traveller site could be connected to the mains foul sewage system. This would have a positive impact on Cambridge's water environment.

We recommend that this policy clarifies that any proposals for new Gypsy and Traveller pitches must not be located within Flood Zone 3. Annex 3 of the NPPF classifies caravans, mobile homes and park homes intended for permanent residential use as 'highly vulnerable' and table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change indicates that 'highly vulnerable' development should not be permitted within Flood Zones 3a or 3b.

## **Infrastructure**

### **Policy I/EI: Energy infrastructure masterplanning**

We note that this policy mentions the possibility of battery storage facilities (often referred to as battery energy storage sites (BESS)). We would recommend including the following comments in consideration of protecting groundwater:

Though under normal operation BESS developments do not present significant risks to groundwater or surface water. However, there is potential for pollution of the water environment due to abnormal and emergency situations at BESS developments, in particular fires. This would be exacerbated if in a vulnerable location, such as Source Protection Zone 1, areas with a shallow groundwater table or near a surface watercourse.

In the event of a fire at a BESS it is currently considered best practice to let the

containers on fire burn out. However, water is likely to be used to cool neighbouring containers. This water could enter burning containers through surface run off or directly from spray cooling neighbouring containers. Furthermore, during or following a fire at a BESS development, water could enter exposed containers through rainfall during the period of time it takes to remove or cover burnt out containers.

There is a risk that highly polluting chemicals in batteries could enter groundwater or surface water in firewater or rainfall. Applicants should consider this risk and ensure mitigation is in place to ensure containment of this water. To appropriately manage the risks from pollution of groundwater and surface water, applicants will need to assess the likelihood of pollutants within the site coming into contact with nearby waterbodies, directly or indirectly, and the degree of risk posed by the particular pollutants in question.

The National Fire Chiefs Council have provided guidance as part of planning practice guidance (<https://www.gov.uk/guidance/renewable-and-low-carbon-energy#battery-energy-storage-systems>) for applicants to consider when preparing applications for BESS developments, to advise Fire and Rescue Services when consulted on applications for BESS developments and for LPAs to consider when determining BESS applications.

### **Policy I/ID: Infrastructure and Delivery:**

We are pleased to see that reference to Foul and surface water drainage has been included in this policy, together with the requirement to demonstrate adequate capacity exists.

## **Site Allocation Policies**

We recommend that the following site allocation policies include relevant recommendations from the Level 2 SFRA site assessments, as detailed below:

### **Site Specific Assessments**

The Site Specific Assessments included in Appendix B of the Level 2 SFRA provide a more detailed assessment of all sources of flood risk at the proposed site allocations, as well as some recommendations on site design and FRA requirements. However, we are disappointed that these do not include an assessment of potential opportunities for safeguarding land for flood storage or using nature-based solutions to reduce flood risk in the area.

Paragraph 172 of the NPPF states that all plans should manage any residual risk by: *c) using opportunities provided by new development and improvements in green infrastructure to reduce the causes and impacts of flooding (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management)*

Most of the recommendations of the site assessments do not appear to have been taken forward into the relevant site allocation policies. It is important these are included in the relevant site allocation policies to ensure that the recommendations are taken forward at the planning application stage and to ensure the Exception Test is passed.

### **Policy S/C/OPM: Old Press / Mill Lane**

This policy should reference the requirement for a sequential approach to be taken to the site layout, with more vulnerable development located within areas at lowest risk of flooding where possible. The policy should also make it clear that a site-specific Flood Risk Assessment (FRA) will need to demonstrate that safe access and egress is available and there will be no displacement of water or loss of floodplain storage. The site assessment recommends that habitable floor levels are set above the maximum fluvial flood level (for the 1% AEP event with climate change scenario) with a suitable freeboard. There are likely to be opportunities to reduce flood risk as part of this development, such as by integrating water storage areas into the landscaping, use of SuDS and reducing the built footprint in the floodplain; such opportunities should be considered as part of a site-specific FRA.

#### **Policy S/BRC: Babraham Research Campus**

We support the inclusion of point 10, which requires the development to '*apply the sequential approach to flood risk within the site, ensuring any development is subject to appropriate mitigation and does not increase flood risk elsewhere.*' We recommend that this is expanded to clarify that only 'water compatible' development should be located within Flood Zone 3 and a site-specific FRA will need to include further assessment of the potential for groundwater flooding to inform the need for appropriate mitigation measures. Consideration should be given to the potential for the adjacent Strategic Enhancement Area to offer opportunities to reduce flood risk through nature-based solutions.

#### **Policy S/SHF: Land North of A1307, Bar Hill (Slate Hall Farm)**

We support the inclusion of point 19 in this policy, which refers to taking forward opportunities for betterment by controlling run off from the site to reduce flood risk downstream. We strongly recommend that this policy refers to the requirement for an FRA to include modelling of Oakington Brook. This is required to ensure that flood extents and depths at the site are adequately defined and a sequential approach is taken to the site layout, avoiding areas of high flood risk. We recommend clarifying in the policy that no development should be located within 8m of Oakington Brook, apart from permitted access.

#### **Policy S/WGC: Genome Campus, Hinxton**

This policy should refer to the requirement for a sequential approach to the site layout, with more vulnerable development located outside any areas at risk of surface water or fluvial flooding. The FRA should consider any opportunities for reducing flood risk, including through the use of nature-based solutions.

#### **Policy S/RRA/CRH: Land adjacent to Cambridge Road (A10) and Mill Lane, Hauxton**

This policy should refer to the requirement for an FRA and need to take a sequential approach to the site layout.

#### **Policy S/NWC: Eddington, Cambridge**

This policy should refer to the requirement for a site-specific FRA to include hydraulic modelling of the ordinary watercourses within the site to define the flood extents at the site. The policy should also clarify that a sequential approach should be taken with more vulnerable development located outside of areas of fluvial and surface water flood risk.

### **Policy S/CBN: Cambourne North**

This policy should refer to the need to adopt a sequential approach, prioritising the location of more vulnerable development outside areas at risk of surface water flooding. We recommend that this policy refers to the requirement for the site-specific FRA to include hydraulic modelling of ordinary watercourses within the site to inform site layout and design levels. The policy should also refer to the recommendation to consider the integration of water management and SuDS at the site into the wider strategy for Blue-Green Infrastructure for Cambourne and how the site can contribute to wider flood and water management benefits across the sub-catchment. The policy could highlight that the adjacent Strategic Enhancement Area may offer opportunities to reduce flood risk through water storage or nature-based solutions.

### **Policy S/NEC: North East Cambridge**

This policy should refer to the need to adopt a sequential approach, prioritising the location of more vulnerable development outside areas at risk of fluvial and surface water flooding. We recommend that this policy refers the requirement for the site-specific FRA to include hydraulic modelling of the watercourses within the site to inform site layout and design levels.

### **Policy I/AD Aviation development**

Though this Policy lists the factors to consider for development of airfields, land contamination has not been included. We would recommend revisions to highlight the need to consider contamination which may have resulted from the operation of the airfields, with particular reference to PFAS as a major potential risk to the groundwater environment. Contaminated Land Assessments should be completed as per the following guidance: Paragraphs 123, 146, 180, 189 and 190 within the [National Planning Policy Framework \(NPPF\)](#); Part IIA of the [Environmental Protection Act 1990](#); The [Land Contamination Technical Guidance](#) on gov.uk including the [Land Contamination Risk Management \(LCRM\)](#) guidance. Our guidance is regularly revised, and therefore, throughout the plan's duration, the most recent version or replacement guidance for superseded versions should be consulted.

## **Supporting Document Comments**

### **Draft Greater Cambridge Local Plan - Infrastructure Topic Paper (2025):**

It appears that this paper has not been updated following the Government announcement of funding withdrawal to support the Cambridge WWTW relocation. We generally support Anglian Water's view that the Local Plan consider safeguarding land for new infrastructure that they may need to provide to support development.

### **Greater Cambridge Local Plan – Infrastructure Delivery Plan (IDP) (December, 2025):**

We are pleased to see that the IDP references the WCS evidence document and includes the need for investment at WWTWs) to accommodate the growth outlined in the Local Plan. Future needs are also referenced, along with the current engagement Anglian Water is undertaking with key external stakeholders to find solutions to capacity challenges, including around solutions for Cambridge WWTW following the withdrawal of funding for the relocation project. We note the IDP may be updated with further information on priority investments once the next version of the Drainage and Wastewater Management Plan (DWMP) is published and capacity solutions have been identified. We encourage an update to the document to ensure the evidence base remains sufficient over the lifetime of the plan.

### **Comments on the Greater Cambridge Integrated Water Management Study – Detailed Water Cycle Study (October, 2025).**

We are pleased to see that the detailed WCS scope covers a number of positive areas, including but not limited to summarising growth projections in relation to DWF uplift, and we welcome consideration of climate change impacts on waste water treatment. It is good to see that the WCS references the Legislation requirements and need to prevent deterioration in The Water Environment (Water Framework Directive) (England & England) Regulations 2017 (WFD) water body status.

Whilst the WCS presents a good baseline of considerations, we would expect to see a more detailed analysis of location-specific environmental risks at a detailed WCS stage. We refer to the Detailed Study section of the Water Cycle Study Guidance available at [Water cycle studies - GOV.UK](#), and in particular consider that the WCS currently lacks sufficient assessment of location-specific environmental risks, as set out in the guidance: *“Check if development and infrastructure proposals will directly modify water bodies. If so, identify how this is likely to affect Water Framework Directive objectives and flood risk.”*

It is really important that evidence within the WCS is capable of informing growth allocations and the Plan can be positively prepared through robust scrutiny of any environmental risks resulting from growth. This is to ensure that sustainable development is supported, through early understanding of strategic infrastructure requirements, and any identification of where any growth locations warrant reconsideration due to environmental risks that may not be able to be managed by standard procedures like Water and Sewerage Company Investment Plan reviews and delivery of infrastructure upgrades. For example, potential need to go to tighter than Technical Achievable Limits (TAL) may present challenges where that may not be feasible, and could have implications for growth. In the absence of this assessment detail within the WCS, it is not possible to confidently say that all allocations are justifiable at this moment. The WCS needs to be updated accordingly, and we recommend maintaining as a living document, which will enable updated data and information to be captured at the earliest opportunity.

We strongly recommend that the WCS considers running SAGIS modelling to understand more detailed analysis of growth projections in locations and any resulting impact on WFD status to better understand the risks to the water environment to protect water quality and support the achievement of water quality objectives.

Once this analysis is complete the WCS should be updated with a clearer and more detailed presentation of the information to ensure summaries and comparison conclusions of growth uplift against risk of deterioration to water body status within each WWTW catchment are understood.

Additional comments on the WCS are detailed below.

#### Uttons Drove WWTW:

This site is mentioned several times in the document and is the intended catchment site for significant growth areas within the Local Plan. The WCS does identify that this site is over capacity (Table 4.11) and will continue to exceed over the lifetime of the Plan period unless upgrades are implemented. Our records align with this information. We are aware that Anglian Water undertook investigations during Asset Management Period (AMP)7 as to how this works could be brought back into compliance and to accommodate growth within the catchment. We understand that improvements were intended for AMP8 (2025 to 2030), however we are not aware of any firm proposals or timeframes for upgrades.

The discharge is currently to a tributary of the Swavesey Drain, which does not have the capacity to accommodate the necessary increased flows that would accompany growth. Anglian Water are aware of the flood risk implications and should have accounted for this in their investigation. However, we do not know what their plans are to manage any increased discharge.

This site is due to receive a close-to-Technically Achievable Limit (TAL) phosphorous limit by 30 March 2030 and the WCS identifies that a below TAL limit will likely be required for an increased dry water flow (DWF). This may prove challenging given the position of the current discharge location (headwater). There could be implications for developments that this site is proposed to serve, depending on Anglian Water's upgrade proposals and timing of delivery.

The WCS should capture the wider challenges of the receiving water body from Uttons Drove WWTW. By capturing the wider flood risk considerations, and ensuring that any efforts to address water quality challenges do not neglect the current challenges around volumetric capacity of the river system to accommodate increased discharges resulting from a net increase in flows from new growth connections within the catchment, it will help tie together the integrated water management assessment within this catchment.

#### Section 2.3.4 - WFD:

We note that the most up-to-date, available, information has been used in this WCS. Please be aware that 2025 classifications are due to be published this year in preparation for the next revision to the River Basin Management Plans (Cycle 4); we recommend the WCS be updated when revised classifications are released to reflect any revision since 2019. This will assist in decisions around suitability of development location and/or phasing requirements over the lifetime of the plan.

#### Section 4.4.5:

There are four identified WWTW that are cross-boundary. It is unclear if the assessments undertaken include known or planned growth in the neighbouring Local Planning Authorities (LPA) for those locations. There could be an impact on potential development delivery for GCSP if existing headroom is already taken by growth in those neighbouring locations. It is therefore essential that GCSP liaise with Anglian Water on an ongoing basis, as described in Section 4.9.19.

#### Section 4.9.19:

We welcome the recommendation for GCSP to continue to update Anglian Water on future development and changes to growth allocations to ensure capacity remains available as and when needed.

#### Section 4.11.1:

The statements in this paragraph are not correct. The Environment Agency does not reassess a WWTW's DWF where we anticipate that it will increase above the permitted value. It is Anglian Water's responsibility to plan to remain in compliance. Where Anglian Water anticipate they will exceed their permitted DWF, then they must apply for an increase. We would then re-evaluate the associated numerical limits, Flow to Full Treatment setting, and Storm Storage Capacity (where applicable) as these are linked to DWF. A permit alteration may be undertaken as part of the Water Industry National Environment Programme (WINEP) where there is a relevant driver; these do not normally relate to altering the permitted DWF.

#### Section 4.11.4 – TAL:

There is no TAL for Suspended Solids. This number is site specific (usually between 10-20mg/l) and generally related to the biochemical oxygen demand (BOD).

#### Section 4.11.13 – Cambridge WWTW stretch target:

The statement around the Environment Agency reviewing this limit given the withdrawal of funding is not correct. The stretch target is included in the AMP8 WINEP obligation for this site. If Anglian Water want to change or remove this target, then they will need to apply for an alteration to the WINEP which we would review in conjunction with Department for Environment Food and Rural Affairs (DEFRA). We have had no such communication from Anglian Water.

#### Section 4.12 – Wastewater Infrastructure Upgrades:

We are pleased that Anglian Waters Drainage and Wastewater Management Plan (DWMP), published in 2023, has been consulted. However, given that this document was produced prior to the change in Government growth priorities for the region, the risk assessments and strategy proposals within that DWMP may no longer be correct. We do note that section 4.14.8. of the WCS mentions the new, emerging DWMP and we encourage GCSP to continue to work with Anglian Water as discussed. Following the publication of the next iteration of the DWMP (due 2028) it will be appropriate to review and update the WCS where necessary.

#### Section 4.13.5 and 4.14.16 – effluent re-use:

Whilst there is merit in exploring the possibility of treated effluent for other purposes, there are currently regulatory mechanisms that must be complied with, including under waste legislation. This may pose additional costs that would need to be considered and their impacts on developers and/or end users.

#### Section 4.14.4 – Load standstill summary:

This paragraph states that the majority of the new revised determinants' permits are above the relevant TAL, with some exceptions. Table's 4.15 and 4.16 appears to show that 17 or 18 sites (depending on development scenario) will require below TAL limits

for Phosphorous when growth is applied. There may be implications for growth in locations where WWTWs are not able to meet tighter standards. We also note Huntingdon WWTW appears in Table 4.16, is this an error?

#### Section 4.14.19 – TAL and WINEP:

The TAL being applied to the WWTWs in AMP8 is to drive improvements in those waterbodies to try and achieve Moderate or Good WFD Phosphate (P) status. Should those same WWTWs need to increase their DWF, then we will review the permitted P limit with the likely outcome that it will need to be further tightened to maintain the aim of the AMP8 driver. Not all WWTW sites will be able to accommodate a below TAL limit and this may have implications for growth in those catchment areas.

#### Section 5.3.19 – WINEP summary:

It appears that not all obligations for sites have been listed. For completeness, we suggest this section is updated to include all obligations.

#### Section 5.8.1 - Development improving water quality:

We consider that the statement in this paragraph provides an overly optimistic view of the impact of development on river water quality. Whilst development can be an investment driver to upgrade WWTW, it will not be the case in all situations. The reference to the proposed new Cambridge WWTW and ‘ultra-low’ phosphorous permit is dubious given there is no definition of what ‘ultra-low’ means, and investment at this WWTW may still not be sufficient to achieve phosphorous limits that would improve downstream water quality due to infeasible costs and/or technological constraints. We are unclear as to why the reference to the proposed new WWTW has been left in this section, given it is stated on Page 2 that the funding for the relocation has been withdrawn.

### **Comments on the Cambridge Area Water Supply Evidence (October 2025).**

#### **Main feedback for local plan policy:**

We note that the GCSP’s CC/WE and S/DS policies are based on the Cambridge Area Water Supply Evidence (conducted by Atkin’s Realis; October 2025) and we would like to highlight the following points for reflection within the local plan:

#### 4.2.3 Meeting local demand & Figure 4-5

Whilst we are pleased to see that this has been updated with the No/Low deterioration risk level of water available for use (WAFU) the significance of this doesn’t appear to be addressed in the report. The main report conclusions look to still be based on the full WRMP level of WAFU when concluding that there’s sufficient water up to 2040. There are target headroom deficits up until 2029 with the No/Low WAFU level of supply.

On page, paragraph under Figure 4-5: “This evidence shows that, based on current forecasts, assumptions and understanding, Cambridge Water’s WRMP24 forecast water availability can meet the needs of the current Draft Local Plan household growth forecast from 2025 to 2040.”

This statement does not take into consideration that the risk of deterioration is not managed to acceptable levels in the early years of the plan.

## Recommendation

We therefore recommend that the GCSP consider what further measures it can put in place to ensure that the most ambitious water supply and efficiency targets are met. In accordance with the [Shared Standard](#), these can include stipulating how policy requirements will be met through a Water Efficient Design Statement at the earliest stage (see Shared Standard page 7, Recommended Policy Wording, Point 2), as well as the requirement for a completion certificate of these standards having been met to have been verified and fully implemented prior to first occupation (see Shared Standard page 7, Recommended Policy Wording, Point 3). Furthermore, and as per the Shared Standard, we would recommend tracking to occur through Authority Monitoring Reports (AMRs) or similar. We recommend that GCSP establish a process to monitor and demonstrate how developments continue to comply with the policy over the duration of the plan.

### 4.2.2/ 4.2.3 Non-household growth

This sections quotes “By 2050, Cambridge Water is planning for 4.8 Ml/d total non-household growth across the following industrial categories”. However, the forecast non-household growth has not been provided for the time periods highlighted in the report (1. short term to 2032, 2. 2032-2040, 3. 2040-50) and has not been compared between the company and that of GCSP.

It is unclear whether the report has considered that all non-household allocation is available for GCSP, or whether it has considered the apportionment to Huntingdon District Council (HDC).

**Recommendation:** As the report has not been able to incorporate the latest developments for HDC, we strongly recommend that GCSP commit to furthering these conversations to determine whether its planned growth can be sustainably accommodated within AMP8 (2025-2030) and what actions GCSP can take for the duration of its proposed plan.

We note that the report states: “Service industries which are population driven, for example education and health which will be driven by population size and demography rather than measures of economic output. This part of the economy is not explicitly considered in the Local Plan”

**Recommendation:** We suggest that this part of the service industries be explicitly considered by the local plan and that any available forecasts from Cambridge Water Company (CWC), or any other partners, be reviewed by GCSP. The demand from these industries within the area could be considerable. It may be worth ensuring that the definition of “education and health” is clear to ensure that major services such as the University of Cambridge and biomedical/Addenbrookes hospital are being accurately reflected within the GCSP’s plan. Whilst the majority of water demand for these industries is likely to be domestic in use and not be subject to CWC’s current non-household policy, an appreciation for the water demand values can help further develop GCSP’s policy.

### 5.5 Future for non-household demand

We would like to highlight the need for GCSP to incorporate a policy which addresses the potential high water demand new data centres can introduce for the duration of its

plan. We are seeing other water companies developing policy which includes declining applications for data centres that do not incorporate a closed loop systems for water cooling. This is a developing topic, and we would strongly encourage a statement within policy CC/WE which will address data centres' water efficiency, such as requiring written confirmation from the water supplier that the water demands can be met sustainably. As referenced in this section, it is likely that requests from such industries in the East of England would employ more water-efficient technologies. Therefore, we would encourage policy that stipulates that water for cooling should not come from non-potable sources and applications will be resisted where alternative cooling methods can be applied.

## **Future Engagement**

We have provided the above recommendations and proposed amendments to the Local Plan and Supporting documents. We would be happy to provide further advice in advance of the next stage of statutory consultation under our Cost Recovery Planning Advice Service. Please contact us at [planning.eastanglia@environment.gov.uk](mailto:planning.eastanglia@environment.gov.uk). if you wish to enter into a charged for agreement regarding any of the above recommendations or to review any further versions of documents outside of the statutory process.

We trust that this advice is useful.

Yours sincerely,

  
**Planning Advisor**

