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Environment Agency (EA) Position Statement regarding water quality risks due to waste water capacity pressures related to the Cambridge Waste Water Treatment Works (WWTW)

Summary

- Cambridge WWTW is exceeding its permit limits and discharges from the WWTW are a significant contributor to the River Cam failing to meet the statutory environmental objective of good status.
- Improvements at the WWTW are needed to prevent deterioration of the River Cam and support it to meet 'good' status.
- The improvements under the Water Industry National Environment Programme (WINEP) will help with this. These are scheduled for delivery by 31 March 2030 as part of the current Asset Management Plan (AMP8) period. It is unclear whether there was any additional funding allocated within Anglian Water Services Limited's (AWS) business plan for any upgrades to increase capacity at the current WWTW. Plans to relocate the WWTW are now on hold, and it is uncertain how improvements will be achieved at the current WWTW.
- We have undertaken a basic assessment of AWS' interim proposal to increase Dry Weather Flow (DWF) by 23% at the current WWTW to understand if the increase in capacity will accommodate additional connections to the WWTW without unacceptable harm to the River Cam. This assessment shows:
 - The 23% DWF increase should provide sufficient capacity to accommodate increases in discharges from developments with planning permission that will be occupied by 2030.
 - There may be a very small amount of additional capacity for any additional development that gets permission and will be occupied by 2030. However, this is based on the assumption that there will be no significant changes in 'live' DWF data. Our modelling assessment used 2024 data as a baseline. It should be noted that the 5-year average DWF indicates a significantly greater measured flow figure and, therefore, if this is taken into consideration, it is very likely that there will be insufficient capacity for additional growth on top of committed sites that will be connecting from 2030 onwards, without risking unacceptable harm to the water environment.
 - Water quality elements will deteriorate, but remain within The Water Environment (Water Framework Directive) (England & Wales) Regulations 2017 (WFD) class status. This is contingent on continued overperformance at the WWTW and it being able to cope with increase

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in flows before infrastructure at the WWTW can be upgraded, and no significant worsening of the baseline condition of the River Cam in the WFD assessment that will be published in 2026.

- On this basis it is critical that the impact of discharges from the WWTW continues to be assessed and monitored and this information is used to inform decisions on new developments seeking planning permission.
- It is also critical that AWS clearly set out how they will deliver investment to increase capacity to protect the environment through improvement works at the current WWTW, so there is confidence that there will be sufficient waste water capacity for developments seeking permission and growth proposed in the Emerging Local Plan, that will be occupied from 2030 onwards.
- We advise risks can be managed by:
 - Planning permissions for development include a condition preventing occupation until sufficient waste water capacity is demonstrated.
 - Preparation of evidence to inform the Emerging Local Plan that includes a more detailed assessment of the capacity for growth at the WWTW and how growth will be aligned with work to increase capacity at the WWTW.
 - AWS setting out clear plans of how they intend to deliver upgrades at the WWTW.

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Context

- The Cambridge WWTW is operated by Anglian Water Services Limited (AWS) and has a catchment that serves all of Cambridge City Council and part of South Cambridgeshire District Council. The two councils have a combined planning team known as Greater Cambridge Shared Planning Service (GCSP). The Cambridge WWTW catchment serves a population equivalent (PE) of 220,159 as of 2024 (source: AWS' 2024 PE returns to EA data).
- Growth forecasts to 2035 and 2050 made within AWS' Drainage and Wastewater Management Plan¹ are now likely to be out of date due to revised Government plans to create growth in Greater Cambridge and the Oxford-Cambridge corridor generally.
- Under The Water Environment (Water Framework Directive) (England & Wales) Regulations 2017 (WFD), there is a requirement for water bodies not to deteriorate and to achieve 'good status' by 2027. Under Regulation 33, local planning authorities as 'public bodies' and the EA as a planning advisor must have regard to these requirements as they are part of river basin management plans (RBMPs).
- Permits at WWTWs are set with limits on the substances and volume of the effluent to protect the quality of the river. Any exceedance of the limits risks a deterioration in the river water quality.
- Under the National Planning Policy Framework (NPPF), there is a requirement for plans and planning decisions do not result in unacceptable levels of water pollution and development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans (para 187(e)).
- The Catchment Data Explorer dataset on gov.uk provides data on the status of water bodies.
- The Cambridge WWTW discharges to the River Cam. The Catchment Data Explorer dataset which provides the status for this water body: [Cam | Catchment Data Explorer | Catchment Data Explorer](#) shows that in Cycle 3 of the Anglian RBMP was classified as 'moderate' ecological status for both the 2019 and 2022 classifications. The Physico-chemical quality element Phosphate is at 'poor' status.
- Monitoring data for the River Cam, including for the discharge from Cambridge WWTW, and Ecology information is publicly available at [Water Data Explorer | Engage Environment Agency](#)

¹ <https://www.anglianwater.co.uk/corporate/strategies-and-plans/drainage-wastewater-management-plan/final-plan>

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- This position statement is intended to be a live document that will be reviewed and updated as our understanding of the issues and solutions evolves.

Evidence of capacity issues at Cambridge WWTW and risks to water quality and meeting statutory environmental objectives

River Basin Management Plan

- The Catchment Data Explorer dataset for [Cam | Catchment Data Explorer | Catchment Data Explorer](#) shows:
 - The overall status of the water body is moderate.
 - The Physico-chemical quality element Phosphate is failing to achieve ‘good’ status with a status of ‘poor’.
 - The reasons for not achieving good (RNAG) status table states that point source water industry discharges (continuous) is confirmed as the reason for the phosphate failure in the Cam water body.
 - Investigations found that eutrophication is highly likely, with the excessive build-up of nutrients, such as phosphate, causing rapid plant and algae growth that block sunlight and deplete oxygen in the water, harming aquatic life.

Conservation Designations

- Cambridge WWTW is upstream of the Cam Washes SSSI, an area of low-lying pastures subject to seasonal flooding and which are important habitat for wintering and breeding wildfowl and waders. The variety of habitat is also important for other fauna as well as flora.
- Pollution from Water and Sewerage Company (WaSC) discharges is cited as an active pressure on the SSSI, but not as a current reason for unfavourable status in two of the units². Further clarification should be sought from Natural England to understand future impacts from waste water discharges.

Environmental Permit Compliance

- The verified 2024 annual compliance data for Dry Weather Flow (DWF) shows that Cambridge WWTW is currently operating in exceedance of its environmental permit for discharge volume. This measured DWF is known as the Q80. If the measured Q80 flow exceeds the permitted DWF, there is a risk of deterioration in

² <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1004020>

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river status. This is because the numerical limits set for pollutants within the discharge (e.g. Ammonia) are based on the DWF volume set out in the permit.

- The WWTW has been exceeding its Q80 for over 5 years and has also been exceeding its Q90 limit for measured discharge volume over the same time period. The Q90 is a trigger used by us for enforcement. When the measured Q90 exceeds the permitted DWF there is an even greater risk of deterioration in river status. AWS must comply with their DWF permit limit. We expect them to apply for an increase in DWF (which will trigger a revision of associated numerical limits) where their permit limit is being exceeded or will be exceeded including because of growth within the WWTW catchment.
- Due to the length of time that the WWTW has been exceeding its permitted DWF, we are currently considering our enforcement position. Any decision we make does not absolve AWS from having to comply with their permit conditions.

Water and Sewerage Company Investment Plans

- AWS are required to implement a Phosphorus (P) reduction scheme at Cambridge WWTW, to 0.4mg/l, during the current Asset Management Plan (AMP8) period by 31 March 2030. The current permit will be updated to include this tighter P limit. The P scheme is being delivered under the Water Industry National Environment Programme (WINEP) component of AMP8 and is intended to help the water body meet a target of WFD Moderate in the river, with the aim of progressing towards WFD Good for that element under a stretch target of 0.25 mg/l, which is the Technically Achievable Limit (TAL).
- Cambridge WWTW was scheduled for a relocation scheme under a Development Consent Order granted on 8 April 2025. Outstanding WINEP schemes within AMP8 would have 'moved' to the new site (where still applicable) once it was operational. The new discharge would be near the current discharge, so impacts on the river are expected to be the same.
- We understand that Cambridge WWTW was identified within AWS' AMP8 (2025-2030) Business Plan for some investment. However, we do not currently understand if this investment applied to the existing WWTW or the planned new WWTW and what it covers (i.e. WINEP obligation delivery or expenditure against the wider business plan).
- Plans to relocate the site have been placed 'on hold' following the decision in August 2025 by the Ministry of Housing, Communities, and Local Government (MHCLG) to withdraw funding that would have supported the WWTW relocation. We are aware that there is currently insufficient investment within the overall AWS AMP8 business plan to fully upgrade the existing WWTW to enable growth within the catchment.

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- The existing Cambridge WWTW requires significant investment to cope with existing and future increases in waste water flows. We understand that meeting the revised Flow to Full Treatment³ (FFT) permit limit that would accompany an increase in DWF will not be possible with the existing treatment capacity. AWS have also indicated that they may not be able to meet the revised, tightened P limit that would be needed with an increased DWF (outside of the WINEP obligation), and that meeting future Suspended Solids (SS) limits will be challenging, based on the current treatment capacity.
- If AWS are unable to demonstrate that Cambridge WWTW can achieve the required standards under a higher DWF, then alternative WWTW(s) will be needed to take increased flows from growth within the existing Cambridge WWTW catchment to ensure the water environment is protected and AWS can operate within its permit conditions.

Environmental Evidence

- We have conducted a basic assessment on the impact on water quality resulting from the current measured flow (2024 data) at Cambridge WWTW which, as set out above, is over permitted discharge volume. This considered WFD Regulations standards for:
 - o Ammonia
 - o Biochemical Oxygen Demand (BOD)⁴
 - o Phosphate
- We reviewed the impact on water quality downstream of the discharge at point of mixing. The modelling uses recent averages for effluent quality, and assumes that this remains constant.

Assessment findings

- Our evidence suggests that the current measured WWTW flows have resulted in deteriorations of up to 8%, although quality remains within current (2019 and 2022) WFD class for the relevant elements (Ammonia (High), BOD (High), Phosphate (Poor)).

³<https://www.ofwat.gov.uk/flow-to-full-treatment-fft-explainer/>

⁴ We have assessed BOD as there are limits for this element within the Environmental Permit for Cambridge WWTW. There are no limits within the Permit for Dissolved Oxygen (DO) concentrations. Whilst BOD is not used to assess overall WFD classification for this water body, there are BOD standards under the wider WFD regulations. BOD is an indicator of organic pollution of the water environment and can be linked to DO. The higher the BOD, the greater potential for oxygen levels in the water to fall, which can stress or even kill aquatic life. Maintaining a low BOD status is therefore important to maintaining a Good or High DO status.

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- AWS are proposing to apply to increase their DWF by around 23% to resolve the current non-compliance and allow for some growth in the catchment up to 2028/29. This increase would include a tightening of associated discharge standards. As there is uncertainty as to when a growth scheme to upgrade the WWTW will be delivered, we therefore reviewed the effects on water quality of this potential increase but assuming no changes to the current effluent quality.
- Should flows increase to those proposed by AWS but in the absence of a growth scheme and updated permit, then there may be deterioration within WFD class of up to 9.5% for Ammonia. There may also be within class deteriorations for BOD (6.6%) and Phosphate (3%). However, for Ammonia and BOD the deteriorations result in water quality being closer to the class boundary High/Good.

Capacity for future growth - further assessment

- On top of the modelling assessment presented above, we have also undertaken a high-level comparison of growth data projections together with trend data for DWF, and considered these findings in relation to the modelling assessment assumptions.
- Our initial findings show:
 - Approximately 7,000+ dwellings are expected to be built between 2025-2030 that would likely connect to the Cambridge WWTW catchment.⁵ This figure does not factor in other growth connection types other than dwellings which may also contribute additional waste water flows.
 - Current exceedances of permitted DWF have already used up a considerable portion of the modelled 23% increased flows. The 5-year average for measured Q80, indicates there may only be approximately 3% headroom within the net 23% increased flows proposed.
 - Risk that flows from permissions granted but not built/occupied yet, or yet to be reflected in data, will use up capacity buffer further.
 - Risk that new growth, if delivered before longer-term improvements are completed could result in flows exceeding the proposed 23% increase in DWF. Growth beyond this is very likely to result in unacceptable pollution.

⁵ (source: caveat figures taken from an incomplete review of 5YHLS [Appendix1GCHTHLSReport2025.pdf](#))

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	Volumetric Flows m³/day	Percentage of current Permitted DWF	Remaining headroom in DWF as a % compared to current DWF	Remaining headroom in DWF as a % compared to proposed DWF
Current Permitted DWF	37,330	100	0	n/a
Latest (2024) measured DWF (Q80)	42,593	114.1	-14.1	9.5
Proposed DWF	46,147	123.6	n/a	0
5-year average measured DWF Q80	44,936.2	120.4	-20.4	3.2

Figure 1: DWF data comparison between current permitted flow volume and proposed DWF increase, against current measured flow data and 5-year trend data

Caveats/assumptions

- Our assessment is a snapshot in time. Volumetric flows in relation to permitted DWF will fluctuate year-to-year for variable reasons.
- Our assessment has not considered in detail the impact that forecast flows from growth commitments, already with permission, will have on available capacity and the available headroom to accommodate new growth without risk of deterioration in water quality.
- DWF data does not take into account 'live' flow data (2024 latest dataset available), with 2025 annual compliance data due spring 2026.
- The data for the Cambridge WWTW shows 'overperformance' in the past, which is where the quality of the effluent is considerably better than required by the permit. However, there is concern that the additional flows could cause the WWTW to lose some of its overperformance and start to see a deterioration in its treatment capacity, and so a deterioration in effluent quality.
- We have assumed that quality levels will remain consistent with the 'overperformance' seen in previous years.

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- Our assessment does not account for the ability of the existing treatment infrastructure to cope with additional flows in the absence of any necessary upgrades. Where infrastructure is not sufficient, there may be increased water pollution from:
 - o Treatment processes not as effective due to increased flows.
 - o Exceeding permitted numerical standards (Ammonia, Biochemical Oxygen Demand, Suspended Solids, Phosphate, or from loss of the treatment 'sludge blanket' to the river).
 - o Increased storm discharges (where the WaSC may decide to protect the downstream treatment infrastructure by balancing incoming flows using the Storm Tanks, thereby reducing storm storage capacity).

We are unable to define or model the likelihood of these incidents occurring and the resulting impact on the environment.

- A new WFD baseline is due next year - early indications suggest this baseline could signal a worse situation than the baseline we have used for this assessment and thus could reduce modelled capacity.
- This modelling considers effects on quality in the river at the mixing point downstream of the WWTW. We did not review potential impacts on the downstream WFD sample point due to distance from the discharge. More comprehensive modelling would be required for this.
- We did not review possible effects on the downstream Cam Washes SSSI. This site does not have specific water quality targets.

To what extent is the EA obliged to provide bespoke assessment information and modelling to prove the impact of development on the water environment?

- Advice we provide in response to planning consultations must be justifiable, evidence based and drawn from our expertise. However, advice does not need to be based on bespoke evidence or investigation to be justifiable. This approach is common practice in development management applications.
- To go beyond this and require the EA to carry out independent, bespoke technical analysis for each application on which its views have been sought is likely to impose an unsustainable burden on us. It would be contrary to two key principles of environmental protection, specifically the polluter pays principle and the precautionary principle. These principles are enshrined in the United Nations' Rio Declaration on Environment (1992) ("the Rio Declaration").

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- These principles were also included in Article 191 of the Treaty on the Functioning of the European Union and have, accordingly, influenced the development of EU law and jurisprudence relating to the environment, much of which is now assimilated law, pursuant to the European Union Withdrawal Act 2018 and the Retained EU Law (Revocation and Reform) Act 2023. Indeed, both are specifically referred to in recital 11 to the WFD. Both principles are also specifically listed as “Environmental Principles” in the “Environmental Principles Policy Statement”, published pursuant to ss.17-18 of the Environment Act 2021.
- The Rio Declaration broadly defines these principles as follows:
 - a) The precautionary principle provides that where there are threats of serious or irreversible environmental damage, a lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.
 - b) The polluter pays principle means that, where possible, the costs of pollution should be borne by those causing it, rather than the person who suffers the effects of the resulting environmental damage, or the wider community.
- In this context, it is sufficient for the EA to have a reasonable (and therefore evidence based) doubt about the possibility of irreversible environmental damage arising from development for it to justifiably object to it. It is for the developer to demonstrate that such doubt is unfounded based on the best available scientific evidence. That the burden of doing this should fall on the developer (rather than the taxpayer) is entirely consistent with the polluter pays principle.
- We will cooperate with developers and GCSP in their efforts to assess and mitigate risks to the water environment, in order to ensure that development can take place where possible. In the next steps section, we set out advice on how developers and GCSP can approach this.

Considerations for decision making on applications

- Until the works to increase the capacity are delivered, all development requiring new connections to mains sewer will increase the flow volumes to the Cambridge WWTW and increase waste water discharges, including phosphate and ammonia, to the water body beyond what the permit allows. It is important that LPA(s) account for the risk this will pose for each development in their decision making. Paragraph 201 of the NPPF does not state that emissions or pollution arising from a use of land are not material considerations in the determination of planning applications. They often will be. The weight that can be given to them will be affected by the extent to which the emissions or pollution can (and will) be controlled by other regulatory regimes. This is supported by *Hopkins Developments Ltd v First Secretary of State* [2007] Env LR 14, *George Bartlett QC*.

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- New developments connecting to the WWTW that increase discharges to the WWTW cumulatively, with planned growth, will have a greater impact. The cumulative impact of developments in applications combined with planned growth should be assessed using information provided by developers as part of their Environmental Impact Assessment (EIA). ‘Planned growth’ should be defined as the amount of growth planned for in the local plan and known from other applications (that constitute windfall development).
- While the EA is not a statutory consultee for EIA ‘Screening’, the information in this position statement can be used to consider if developments, falling under [Schedule 2](#) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, should be screened in and assessed under the EIA process due to the likely effects of the development cumulatively with wider development on the water environment, as a relevant consideration under [Schedule 3](#) of the regulations.
- NPPF para 187(e) requires that planning decisions should prevent new development from contributing to unacceptable levels of water pollution. Planning Practice Guidance for Water supply, wastewater and water quality states that:
 - Water quality could be a significant planning concern when a proposal would indirectly affect water bodies through a lack of adequate infrastructure to deal with waste water.
 - Where water quality has the potential to be a significant planning concern an applicant should be able to explain how the proposed development would affect a relevant water body in a RBMP or designated sites of importance for biodiversity, and how they propose to mitigate the impacts.
 - Where it is likely that a proposal would have a significant adverse impact on water quality then a more detailed assessment will be required. The assessment should form part of the environmental statement, if one is required because of a likely significant effect on water.
 - Detailed assessment should include:
 - How the proposed development will affect measures in the RBMP to achieve good status in water bodies to ensure local authorities discharge their duty to have regard to RBMPs when exercising their duties, including making planning decisions.

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- How it is intended the development will comply with other relevant regulatory requirements relating to the water environment (such as those relating to bathing waters, shellfish waters, freshwater fish, drinking water, internationally and nationally designated sites of importance for biodiversity) bearing in mind compliance will be secured through the EA's permitting responsibilities.
- If there are concerns arising from a planning application about the capacity of waste water infrastructure, applicants can be asked to provide information about how the proposed development will be drained and waste water dealt with. Applications for developments relying on anything other than connection to a public WWTW will need to be supported by sufficient information to understand the potential implications for the water environment.
- When drawing up waste water treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public WWTW (those provided and operated by the WaSCs). This will need to be done in consultation with the WaSC of the area.
- The timescales for works to be carried out by the WaSC do not always fit with development needs. In such cases, local planning authorities will want to consider how new development can be phased, for example so it is not occupied until any necessary improvements to the public sewage system have been carried out.
- While national planning policy does not explicitly require assessment of cumulative risks to the water environment when determining applications, it does not rule this out. Where there is evidence that new (non-EIA) development could contribute to unacceptable levels of water pollution from waste water discharges when combined with discharges from with planned growth, it may be appropriate for a detailed assessment to be undertaken and to consider if mitigation, such as aligning occupation of development until adequate waste water capacity is provided, would be proportionate.

Considerations for plan making

- Cumulative impact assessment is required as part of the plan making process to ensure that there is sufficient waste water capacity for all future developments in the plan. It will also be required for the Strategic Environmental Assessment of the

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plan. This cumulative assessment can be undertaken as part of a Water Cycle Study (WCS) prepared as part of the local plan evidence base.

- NPPF para 20(b) states that strategic policies in local plans should make sufficient provision for waste water and para 187(e) requires that planning policies should prevent new development from contributing to unacceptable levels of water pollution.
- Planning Practice Guidance for Water supply, wastewater and water quality states that plan-making may need to consider:
 - The sufficiency and capacity of waste water infrastructure.
 - The phasing new development so that water and waste water infrastructure will be in place when and where needed. The impact on designated sites of importance for biodiversity should be considered to ensure the required infrastructure is in place before any environmental effects occur.
 - The capacity of the environment to receive effluent from development in different parts of a strategic policy-making authority's area without preventing relevant statutory objectives being met.
- GCSP are reviewing the Local Plan and a Regulation 18 public consultation is currently ongoing between 01 December 2025 and 30 January 2026. An Outline WCS was published in August 2021 as part of the Greater Cambridge Integrated Water Management Study. GCSP is currently developing a Detailed WCS, and an updated version was made available as part of the supporting evidence base in the latest public consultation. GCSP are engaging with AWS and the EA.

Environment Agency advice

- This position statement will be the basis for EA advice for applications we are consulted on that will result in new connections to the Cambridge WWTW and for growth proposed in the Emerging Local Plan.

Advice on planning applications

- Given that national planning policy does not explicitly require assessment of cumulative risks to the water environment when determining applications, for developments that do not require EIA, it is unlikely that the impact of increased discharges from individual developments will be significant enough, in each instance, to contribute an unacceptable level of water pollution (as per NPPF para 187(e)). LPAs should be satisfied this is the case for each development.

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- Where there is evidence that non-EIA development could contribute to unacceptable levels of water pollution from waste water discharges when combined with discharges from with planned growth, it may be appropriate for a more comprehensive assessment of the capacity of the WWTW and the receiving environment to be undertaken and to consider if mitigation, such as aligning occupation of development until adequate waste water capacity is provided, would be proportionate. For smaller WWTWs that serves a small area, discharges from a single development are more likely to present a significant risk compared to large WWTWs that serve a large area. But other factors are relevant too, such as the capacity at the WWTWs, the capacity of the receiving water environment (i.e. if it is failing or likely to fail to meet statutory environmental objectives) and timescales to increase capacity at the WWTWs.
- This comprehensive assessment is best led by the LPA and the WaSC and working with the EA to understand overall capacity and risk to the environment so the LPA can make consistent decisions, as outlined in the next steps section of this position statement. The EA will only be consulted on a minority of these developments, so it is important the LPA has this understanding so they can make consistent decisions on developments whether or not the EA is consulted.
- For developments requiring EIA (and for the local plan), there is a very strong case for assessment of the cumulative risks from planned growth be considered. It is our view, based on the evidence in this position statement, that the cumulative impact of increased discharges, arising from new, planned growth, could contribute to an unacceptable level of water pollution. We advise the cumulative impact of developments in applications combined with planned growth should be assessed using information provided by developers as part of their EIA. This should include assessment of the capacity of the WWTW and the receiving environment to be undertaken, accounting for statutory environmental objectives.
- 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 Cambridge WWTW to protect water quality and support the achievement of water quality objectives. We have started discussions with GCSP about a proposed condition that can be used for new permissions granted.

Local plan

- A comprehensive assessment of the capacity of Cambridge WWTW and the receiving environment, accounting for statutory environmental objectives, should be undertaken to understand if planned growth can be accommodated until capacity at the WWTW is increased. We strongly advise that this forms part of a WCS, prepared as part of the Local Plan evidence base that assesses waste water

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capacity to support growth and achievement of statutory environmental objectives across the Plan area.

- GCSP is currently developing a Detailed WCS as part of the Local Plan evidence base. The WCS should assess waste water capacity to support growth and the achievement of statutory environmental objectives across the plan area. This should assess capacity at the Cambridge WWTW to accommodate growth coming forward in applications and the next local plan. Should this identify risk that environmental objectives will not be met the LPA should liaise with AWS to understand when improvement works will be undertaken at Cambridge WWTW and plan growth that connects to it accordingly, or explore if AWS can deliver work to increase waste water capacity more quickly to align with planned growth timescales.

Next steps

- It is important that the cumulative impact of planned growth on risk to water quality due to increased discharges to the Cambridge WWTW are understood. This will enable GCSP to properly account for them in their Emerging Local Plan and for developers and GCSP to account for them when preparing and determining developments that require EIA.
 - Consideration should be given to the need for further assessment to address the uncertainties linked to the caveats and assumptions set out in this position statement, to support a more robust understanding of the capacity for growth.
 - This work should be incorporated into the Emerging Local Plan evidence base, as part of the WCS or as a standalone study.
- It is likely this information will confirm a lack of capacity to support growth, but also quantify it. This will allow an understanding of:
 - How much growth can occur before unacceptable harm to the environment is caused.
 - When AWS need to complete works to increase capacity at the WWTW in order to serve growth, avoid unacceptable harm to the water environment and achieve statutory environmental objectives (i.e. good status).
- To support this, AWS need to confirm:
 - the specific works planned to increase capacity at Cambridge WWTW;
 - how much capacity this will provide; and

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- when the works will be completed by.
- Continue discussions for use of conditions to ensure development getting permission in the coming months and years will not be occupied until sufficient WWTW capacity is in place.
- These steps will help GCSP make decision about applications for development that will create new connections to the Cambridge WWTW. It will also allow AWS to align their plans and timescales to increase capacity to meet the needs of growth, whilst ensuring the water environment can improve and environmental objectives can be met.