

## Anglian Water Consultation Response

### Greater Cambridge Draft Local Plan Consultation

#### 1. Anglian Water

- 1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. The region we serve, is the driest in the country, receiving less rainfall than other regions. Our region is prone to both drought and flooding — 28% of land is low-lying. It is also rapidly growing – home to three of the fastest-growing cities in the UK, Cambridge, Peterborough and Milton Keynes – alongside a thriving agricultural and burgeoning green energy industry, all of which have significant demands for water and drainage.
- 1.2. As a long-term, purpose-driven business, we are planning sustained investment over decades, to build resilience against a changing climate, deliver essential investment in water and sewerage infrastructure, alongside protecting and enhancing the environment: all of which will create jobs and bolster the local economy.

#### 2. Anglian Water and Local Plans

- 2.1. Anglian Water is the statutory sewerage undertaker for the Greater Cambridge Local Plan area and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water wants to proactively engage with the local plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.
- 2.2. The system that plans for growth and funds the infrastructure to support it – especially when it comes to water and wastewater – is not aligned. Anglian Water recognises that this region includes fast-growing cities and globally significant innovation, which requires the space to deliver sustainable, inclusive growth that is underpinned by infrastructure and water resilience. Anglian Water is working hard to chart the path between environmental compliance and supporting growth across our region, but we need innovative approaches and a collaborative way of working with local planning authorities, our regulators, and government to tackle these challenges.

#### 3. Commentary on the Greater Cambridge Local Plan

- 3.1. Anglian Water has liaised with Greater Cambridge Shared Planning Service (GCSPS) on the preparation of the Local Plan and supporting evidence, including the Water Cycle Study (WCS) and Strategic Flood Risk Assessment (SFRA). We have the following comments on the Draft Local Plan – Preferred Options:

### **Water Delivery Taskforce and the Cambridge Growth Company:**

Anglian Water notes that the draft Local Plan is based upon the Council's own evidence and follows the normal plan-making approach for the Greater Cambridge area. In terms of infrastructure delivery to support growth across our region, it is important that we take account of the longer-term ambitions for growth that will be brought forward by the Cambridge Growth Company, in addition to that being proposed in the Greater Cambridge Local Plan (GCLP) when assessing current and future infrastructure needs.

Anglian Water are engaging with Cambridge Growth Company through Defra's Ministerial Water Delivery Taskforce. The work through the Taskforce is focusing on what is required to ensure water and wastewater is not a challenge to growth in the short-term and long-term at Cambridge, and wider priority growth locations. Anglian Water is positively engaging and working with government and regulators through this Taskforce to support work in increasing the capacity at Cambridge Water Recycling Centre (Wastewater Treatment Works). However, there are key asks of other stakeholders through the Taskforce, which will be needed to realise the full growth potential of Greater Cambridge, including suitable funding mechanisms for additional growth outside of our Business Plan process, and regulatory and policy changes.

### **Part 2: Development Strategy**

#### **Vision:**

Anglian Water is supportive of the seven strategic priorities set out in the Vision, particularly those that align with our long-term strategic ambitions.

We support direct reference to higher achievable standards for water use to reduce environmental impacts. Anglian Water is directly engaged with the Cambridge Water Scarcity Group, as we jointly bring forward strategic supply options with Cambridge Water - including the [Grafham to Cambridge](#) strategic pipeline (Phase 1 of the 70km Grafham to Rede pipeline) and the [Fens Reservoir](#).

#### **Policy S/JH: New jobs and homes**

When Anglian Water submitted our Business Plan to Ofwat in 2023, the framework was not designed to account for the pace and scale of growth outlined by the government in the "Realising the Full Potential of Greater Cambridge" statement, and the subsequent change to the standard method for calculating local housing need in the National Planning Policy Framework and Planning Practice Guidance updates (December 2024). This means that the scale of growth funded in our AMP8 Business Plan, does not sufficiently reflect the scale of growth pressures or the level of funding to address them.

Anglian Water is committed to enabling sustainable growth and is collaborating with Greater Cambridge Shared Planning Service, Government departments, and external stakeholders to find solutions to capacity challenges. We are working to secure policy and regulatory change that

allows water companies to better support growth, for example by allowing us to invest strategically to create new capacity ahead of growth materialising, and by changing charging rules to allow for developer contributions to new infrastructure. These align with the direction of travel in the recently published Government white paper, A New Vision for Water (January 2026). Successful delivery of the reforms set out in the white paper, as well as urgent action to manage the transition to the new regulatory system, is vital to securing the investment in infrastructure which is needed to support growth.

Anglian Water continues to work closely with Defra's Ministerial Water Delivery Taskforce, regulators and other stakeholders to resolve ongoing challenges around growth in our region recognising that Cambridge is one of the areas of strategic national importance to the government's growth agenda. This includes working to bring forward a phased strategy to address dry weather flow capacity at the existing Cambridge WRC, so it has sufficient capacity to enable the delivery of current and future growth. This is reliant on funding being secured for development of a growth scheme, and discussion with regulators are ongoing on the most appropriate funding mechanism for this.

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

Anglian Water notes that the Development Strategy for Greater Cambridge directs growth to the most sustainable locations, with the focus on the Cambridge urban area, Cambourne, other new settlements and the rural southern cluster which has strategic transport links and employment opportunities. Anglian Water recognises that nationally strategic infrastructure projects such as the A428 Black Cat to Caxton Gibbet upgrade and East West Railway are catalysts for sustainable connected growth across our region and together with three planned busways into Cambridge, have shaped the Development Strategy for Greater Cambridge.

The key sites within the **Cambridge urban area**, and on the **edge of Cambridge** (a and b) includes **North East Cambridge**. It is noted that the policy (2.a.i) provides flexibility for the type of development indicated for this site, as a result of the Government's withdrawal of funding for the Cambridge Waste Water Treatment Plant Relocation (CWWTPR) in August 2025, following Development Consent Order approval for the scheme in April 2025. Anglian Water considers that this flexibility for development of the site is important, because of the investment now required to address capacity at the existing Cambridge WRC.

Table 4 and paragraph 2.41 of the supporting text sets out the homes to be delivered, including the potential for 3,950 homes from the North East Cambridge allocation within the plan period, when plans for the CWWTPR were anticipated and expected to release this significant brownfield site on the edge of Cambridge - the Hartree component of the development. It is clear that the headroom provided by the total supply of homes, is substantially reduced (14.7% to 6.5%) if this quantum of housing need is removed from supply at North East Cambridge. Anglian Water is aware that the options for increasing capacity for wastewater treatment that are currently available are limited and primarily based on further investment at the existing Cambridge WRC,

meaning that the quantum of housing proposed at North East Cambridge cannot realistically come forward while the existing WRC remains operational, due to odour constraints that would impact on the amenity of residential occupiers and other potentially sensitive uses.

As set out in our response to the Competition and Markets Authority (CMA), the withdrawal of government funding (through Homes England) means Anglian Water now faces substantial unfunded costs to maintain and expand the existing WRC in order to support the region's ambitious development targets. Given the urgency and the lack of a defined funding route, Anglian Water has worked closely with Ofwat and government departments to seek a solution through the Water Delivery Taskforce. Discussions on the most appropriate funding mechanism remain ongoing. In the event that funding is resolved, the CWWTTPR Development Consent Order April 2025 permits the commencement of the CWWTTPR project until April 2030.

Anglian Water has been proactive in conversation with our regulators, to identify the interim solution needed to bring our existing Cambridge WRC into dry weather flow compliance, and plan for delivering further phases to accommodate the growth ambitions for the city and surrounding areas. This includes continuing plans to deliver the Waterbeach pipeline between Waterbeach (including Waterbeach New Town) and Cambridge WRC. This would mean and existing and future wastewater flows from Waterbeach/Waterbeach new town, would be treated at Cambridge WRC, and become part of the Cambridge WRC catchment.

i./iii/v For new settlements, there is a considerable expansion at **Cambourne North** to link with a new proposed East West Rail station and the carried forward allocations at **Bourn Airfield** and **Northstowe**. The growth at Cambourne, has and continues to be considerable. Both Cambourne and Northstowe are within the Uttons Drove WRC catchment, which is being considered as part of our longer-term planning for the 2025–2030 asset management period (AMP8) and beyond. In line with PR24 adaptive planning principles and our ongoing discussions with Ofwat, we are reviewing growth forecasts across our operating areas and developing options on how to approach investment that can respond to uncertainty in the scale and timing of development. Any future investment at Uttons Drove would contribute to additional capacity and resilience within the catchment; however, it is unlikely that this alone would accommodate the full scale of growth currently proposed. Supporting later phases of development at these locations will therefore require a longer-term strategy, progressed through future planning and price review cycles as growth assumptions are refined and investment needs are confirmed.

Anglian Water is currently preparing the next iterations of the Drainage and Wastewater Management Plan (DWMP28) and Water Resources Management Plan (WRMP29) which will address the 25-year period 2030-2055, going beyond the local plan period to 2045. Throughout this process we will be engaging with local planning authorities to update and seek views on these plans and the growth scenario best aligned to our region.

The DWMP will inform our investments in the next Business Plan (Price Review 2029 – PR29) for the Asset Management Period 2030-2035 (AMP9). The next DWMP must set out how we will manage and develop our drainage and sewerage systems to meet our obligations under Water Industry Act 1991. As with the WRMP, this includes understanding how to deal with challenges such as asset health, climate change and population growth. Using this information, we will conduct a risk assessment for three different timescales: the short- (5yr), medium- (15yr) and long- (25yr +) term. The outputs from these will allow us to develop ‘best value’ investment solutions to meet our obligations.

C.ii. **Land at Grange Farm** proposes a standalone new town that is not directly associated with existing WRC catchments. As indicated in the Stage 2 Detailed Water Cycle Study, this allocation could either be served by Sawston WRC, subject to a future growth scheme and associated permit requirements, or a separate onsite WRC could be delivered by the master-developer with the option for adoption by Anglian Water if specific design and operational requirements are met. An onsite solution would also require the necessary discharge permit to be agreed with the Environment Agency.

C.iv. **Waterbeach new town** - please see commentary regarding growth at Cambridge WRC and the Waterbeach pipeline to ensure growth at the new town can continue to come forward in alignment with other infrastructure delivery requirements.

D.i. The **Wellcome Genome Campus** represents a new allocation, but one that already has planning consent. The Campus would connect to Sawston WRC, and future investment at the WRC would need to consider cumulative growth in the catchment, and whether this includes the phased delivery of the new settlement at Grange Farm.

D.ii. **Babraham Research Campus** - whilst Babraham is within the Sawston WRC catchment, it is noted from the current application 25/04634/OUT (yet to be determined) for employment and housing growth within the allocation, that the proposed method of foul water and surface water disposal does not relate to our assets and would be through new treatment plants or the existing treatment plant on the central campus (Flood Risk Assessment and Drainage Strategy Report - section 10.2).

i./ii. In the rest of the rural area, the employment areas **Slate Hall Farm** and **Land to the south of the A14 Services** are both adjoining the Uttons Drove WRC catchment. Our comments regarding growth and capacity at Uttons Drove WRC (see 2.c. i/ii/v above), will therefore be relevant for these sites.

Anglian Water considers that the Detailed Water Cycle Study is an important element of the evidence base to help inform the appropriate phasing of sites to align with the infrastructure delivery plan, policy requirements in terms of sustainable use of water resources, and infrastructure capacity for wastewater treatment. The strategic scale of these allocations, mean

that some sites are projected to deliver well beyond the plan period, and will be used to inform our long-term delivery strategy for growth.

A further factor, in relation to water quality, and achieving Water Framework Directive targets, is that several WRCs, including Cambridge and Uttons Drove will be required to meet Technically Achievable Limits (TAL) for phosphorus by March 2030 under the AMP8 Water Improvement National Environment Programme (WINEP). Increased volumes of wastewater at these WRCs and the need to apply for increased dry weather flow permits, means that phosphorus concentrations in the treated effluent must be even lower (i.e. going beyond TAL) to ensure the same total amount of phosphorus enters the river. Options to address TAL and growth are in the process of being discussed with our regulators and government, to find an acceptable solution that helps to facilitate growth while protecting the environment, including internationally important chalk streams.

#### **Paragraph 2.55**

It is noted that the preferred option for the spatial strategy is identified as a blended option, underpinned by development strategy principles. These principles align with Anglian Water's strategic long-term ambitions to be resilient to the risk of drought and flood, a carbon neutral business, enabling sustainable economic and housing growth, and working with others to achieve significant improvements in the ecological quality of catchments in our region.

We support the development management principle that necessary utilities should be supported in a sustainable way so that the environment is protected and enhanced. We consider this principle is fundamental to supporting sustainable and resilient growth, and to enable investment to be brought forward to address the considerable growth being planned for the Greater Cambridge area, whilst ensuring the environment is protected. Addressing the scale and pace of growth is a considerable challenge, and one that we continue to work with the GCSPS and Government departments to bring forward a strategy to help unlock growth.

#### **Paragraphs 2.80-2.84 Water Supply**

As identified by this section of the draft Local Plan, Anglian Water is already working with Cambridge Water to deliver strategic water supply options to address the water resource needs of the area, and enable more water to remain in the environment, to protect internationally important chalk stream habitats.

We support the Plan's strategy to phase growth at new strategic sites to align with the delivery of strategic water supply options. It is important that these water supply options are also underpinned by demand management solutions, and tighter water efficiency standards for new development. Opportunities for integrated water management, including reuse, are significant factors for consideration in new development proposals coming forward, and align with the measures the Cambridge Water Scarcity Group has been developing.

#### Paragraphs 2.85-2.87 Wastewater treatment

As indicated in our response, Anglian Water is working proactively with stakeholders, to address current capacity constraints at some of our water recycling centres (WRC). This has been further exacerbated by the withdrawal for funding for CWWTPR, meaning that further investment will need to be brought forward to deliver enhancements at the existing Cambridge WRC in the short term, and in the long term if alternative funding cannot be secured for delivery of CWWTPR. Until such time as the opportunity to deliver CWWTPR expires, the Local Plan should recognise the CWWTPR project and ensure appropriate safeguarding of the consented relocation site (as requested under Policy I/SI).

Anglian Water is currently preparing the DWMP28 and we will continue to engage with the Councils at various stages of the DWMP's development to ensure that this takes account of the quantum of growth proposed for Greater Cambridge.

#### Policy S/SH: Settlement hierarchy

Anglian Water is generally supportive of the approach set out in the policy, and the provisions setting out the parameters for growth in each settlement category. It is noted that for Cambridge, Towns and Rural Centres the policy is clear that development should come forward (without any limit imposed) "**provided that adequate services, facilities, and infrastructure are available or can be made available as a result of the development**". However, this same requirement is not included for growth at smaller settlements including Minor Rural Centres, Group Villages, and Infill Villages.

Anglian Water requests that this qualifying statement to demonstrate that adequate infrastructure is available, should be applied to all the settlement categories within the settlement hierarchy, so development proposals clearly address infrastructure capacity - this includes wastewater treatment capacity in the network and the receiving WRC (as evidenced by the Stage 2 Detailed Water Cycle Study). For small settlements (e.g. Tadlow) where we have WRCs with a descriptive permit i.e. Descriptive Works - our [position statement](#) indicates that proposals that seek to connect to our network will be objected to unless the developer can demonstrate there is sufficient capacity at the works, OR an onsite solution such as a package treatment plant is approved.

Alternatively, similar wording to Policy S/DE clause 1.c could be used for the smaller settlement categories to ensure "**There is the necessary infrastructure capacity to support the development**".

#### Policy S/DE: Defined development extents

Anglian Water supports the policy requirement 1.c to ensure that there is the necessary infrastructure to support the development within defined settlement extents. However, it is considered that this should be equally applicable to developments outside defined settlement

extents but may still be adjacent to the settlement and/or our WRC catchments - e.g. Rural exception sites.

The policy does not specifically reference the delivery of utility services /infrastructure in the countryside, which would include critical water and wastewater infrastructure to serve existing and future communities. Our infrastructure, by its very nature is often located on the edge of settlements or in the countryside. We would suggest that the policy could be more positively framed to address these types of developments.

We request the policy is amended in this regard to state:

**Proposals for the delivery and operation of essential utilities infrastructure, where there is a proven need and a countryside location is essential for the delivery of those utilities, will be supported where they accord with other policies in the development plan** (Based on the wording in West Suffolk Local Plan Policy 24 Economic development and essential utilities in the countryside).

### 3 SITE ALLOCATIONS

Matters including asset encroachment (Policy WS/HS) and utilities infrastructure (see our comments relating to Policy GP/QD) should be a consideration for any site allocation where we have existing assets, or where the site is in close proximity to our operational sites and should therefore avoid the need to introduce separate clauses within any of the affected site allocation policies.

Anglian Water can provide a list of assets within the proposed site boundaries, if this would be helpful to the Councils. The following sites have sewer pumping stations located within or adjacent to the site and as 'above ground' assets this will be land within Anglian Water's ownership, and may have implications for site layout and design:

- S/C/CLT: Clifton Road Area
- S/CE: Cambridge East
- S/CBC: Cambridge Biomedical Campus
- S/CB: Cambourne Town Centre
- S/ED: Eddington
- S/NEC: North East Cambridge

We are content that Policy CC/W will apply to all site allocation policies in terms of integrated water management, sustainable drainage and water quality (subject to consideration of our specific comments). This will require developers to demonstrate, inter alia, that there is sufficient capacity to convey and treat wastewater flows from new development within our sewer network and at the receiving WRC.

Furthermore, we recognise that the Stage 2 Detailed Water Cycle Study should be used to inform the site phasing trajectories where it is identified that there is currently insufficient dry weather

flow capacity at our WRCs to treat wastewater flows from new development. Anglian Water has provided data to inform the preparation of the WCS, and we continue to work closely with the GCSPS to advise on timescales for future investment at these WRCs. Similarly, resolving the impact of environmental pressures, including WRCs that will need to meet technically achievable limits (TAL) for phosphorus, and the approach required to enable future sustainable growth is a matter Anglian Water will continue to discuss with the Environment Agency and key stakeholders to assess future options for growth.

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

Please see our comments in relation to Policy S/JH and Policy S/DS. We note that paragraph 3.1.3 sets out the Councils' intention to continue engagement with relevant partners to confirm a refined position for the site. Anglian Water recognises that our current position and strategy to invest in the existing Cambridge WRC, because of the withdrawal of funding for the CWWTPR, and in the absence of alternative funding being secured, will have a significant bearing on the site allocation and future updates to the spatial framework. We will continue to liaise with the Councils as we progress our plans to increase dry weather flow capacity of the WRC and enable growth across the Cambridge WRC catchment to come forward.

#### **Policy S/AMC: Areas of Major Change**

Anglian Water supports this strategic allocation policy which requires that the necessary infrastructure to support the development has been secured and a phasing strategy is in place where the phased provision of infrastructure is required - this is consistent with Policy I/ID.

We agree with clause 4, that the redevelopment of these areas of major change, should protect existing assets including "water management". However, the supporting text should qualify what this term encompasses. These sites also offer the opportunity to improve the public realm, achieving betterment through provision of SuDS and water reuse.

#### **Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge**

The public realm improvement areas should also offer the opportunity to achieve betterment through provision of SuDS and water reuse. Such measures are not implicit in the policy or subsequent site-specific policies, and we consider this should be positively expressed in this overarching policy.

#### **Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital) Policy S/WC: West Cambridge**

Anglian Water welcomes the policy requirements set out within the Resources section of these policies, which sets out important measures including innovative approaches to water management on site, including SuDS, water reuse and solutions to address flood risk, and sewage disposal.

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

Anglian Water supports clause 17, to ensure that the Eddington development continues to utilities surface water run-off to supply non-potable water reuse in new homes (e.g. to flush toilets and outdoor use). Eddington has been at the forefront of showcasing what can be achieved as a sustainable and resilient water smart community.

### 3.3 New Settlements

Please note that specific comments regarding wastewater treatment at our WRCs has already been addressed under Policy S/DS. We support the requirements for a Foul Drainage Strategy to support the delivery of these settlements and consider that this requirement should be consistent across the new settlement policies (dependent of the stage of planning consent each site has progressed to).

#### Policy S/CBN: Cambourne North

Anglian Water notes the strategic significance of this allocation to align with the proposed East West Rail station - a catalyst for sustainable growth around key transport hubs, including the proposed Cambourne to Cambridge busway, which aligns with government priorities for growth. The quantum of development, which will be delivered beyond the lifetime of the plan, will need to be appropriately phased to align with delivery of supporting infrastructure.

The strong framework for delivering green and blue infrastructure, aligned with the Local Nature Recovery Strategy, provides important multi-functional benefits, including water management and mitigating flood risk.

We support the robust requirements for managing surface water run-off and provision of foul drainage and sewerage proposal. We agree that the preparation of a Climate and Sustainability Innovation Delivery Plan sets out the key expectations for delivering a climate resilient community and ensures the sustainable use of natural resources, including high standards of water efficiency and on-site water use. The requirement for a Foul Drainage Strategy is also welcomed.

#### Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm

Anglian Water supports the landscape-led design to deliver ecological enhancement, and multi-functional green and blue infrastructure, which will contribute towards integrated water management and mitigating flood risk.

We support the requirements within clause 19 under the Resources section of the policy regarding sustainable water management. Whilst the quantum of growth is lower than Cambourne North, we question why the approach in the Resources section, is not aligned with Policy S/CBN which includes the preparation of a Climate and Sustainability Innovation Delivery Plan and a Foul Drainage Strategy.

We agree with clause 20, which provides flexibility for on-site wastewater treatment or a suitable nearby location. This aligns with the Detailed Water Cycle Study and provides alternative infrastructure options that could help support delivery preferences in this location.

### 3.5 Rest of the rural area

#### **Policy S/RRA/SCS Land south of the A14 Services**

The proposed allocation covers 24.58 hectares to the south of Cambridge Services and has capacity for approximately 90,000 sqm of B2/B8 Industrial and Logistics development and 150 lorry parking spaces. This allocation overlaps with the proposed pipeline corridor and preferred engineering route for the pipeline identified in our Phase 3 consultation for Fens Reservoir. The design refinement process will be ongoing as the Fens Reservoir scheme progresses. Anglian Water would welcome continued dialogue and engagement with South Cambridgeshire District as there is concern that if the employment allocation was to come forward ahead of the Fens Reservoir, this would reduce flexibility to adjust the alignment of the pipeline and also make its construction much more complex due to the requirement to cross the A14 in close proximity to the proposed allocation. Furthermore, new receptors would be introduced close to the construction works which would need to be taken into consideration in our Environmental Statement and additional mitigation may be required. Similarly, the Grafham to Cambridge pipeline corridor (26/00198/SCOP) may also have a minor interface with this site, although designs will be refined prior to submission of the planning application.

In the event that the draft allocation is maintained, we would ask that the site area proposed is revisited to avoid this conflict, and that additional wording is added to the Policy wording to require the future developer to engage with Anglian Water from the outset to agree the design and layout in order to ensure the two developments are compatible including their construction phasing, alongside agreeing appropriate easements and access for long term maintenance. **Until such time that appropriate amendments are made to the draft allocation and its wording to safeguard the delivery of the downstream route corridor for the Fens Reservoir, Anglian Water object to the draft allocation. We would welcome the opportunity to discuss the policy area and wording with you further.**

#### **Policy S/RRA/BBP – Land at Buckingham Business Park, Swavesey**

The proposed allocation covers 2.11 hectares at Buckingham Business Park and has capacity for approximately 10,000 sqm of B2/B8 Industrial and Logistics development. This draft allocation is adjacent to the preferred route of the associated water infrastructure. As mentioned above, the design refinement process for the Fens Reservoir is ongoing and the alignment of the pipeline is potentially subject to change which may impact this allocation in due course. Given the proposals are still at an early stage, **Anglian Water requests ongoing engagement with the Council throughout the preparation of the Local Plan, and the future developer at the appropriate time. This will ensure that both developments can be progressed and are compatible, including during construction and operation.**

Anglian Water supports policy clause 1.a that requires an odour assessment regarding the proximity of Uttons Drove WRC, and the implementation of any necessary mitigation measures that might be needed.

#### 4 CLIMATE CHANGE

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

Anglian Water fully supports the policy requirements to ensure sustainable and resilient development embeds the principles of climate change mitigation and adaptation. We agree that a proportionate Sustainability Statement should be submitted to demonstrate how these policy requirements have been met, and these may be supported by separate assessments or strategies including flood risk assessments and surface water drainage strategies.

The inclusion of integrated water management, nature-based solutions and circular economy fully align with the sustainable use of water resources, that contribute towards "Enabling Water Smart Communities" [www.ewsc.org.uk](http://www.ewsc.org.uk). The EWSC project is an Ofwat Water Breakthrough Challenge Innovation Project that promotes integrated water management initiatives that provide alternative ways to sustainably manage water in housing, reduce flood risk and improve water quality - helping to support people and nature to thrive together.

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

Anglian Water strongly supports the policy requirement for tighter water efficiency standards in new development that can help make development across the district more water efficient and allow sustainable growth, whilst longer term water supply solutions are being developed/implemented. As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives. The implementation of tighter water efficiency standards will also help to reduce the operational and capital carbon required to heat water in the home, deliver infrastructure, and pump and treat wastewater flows from new development.

Whilst it is referenced in the Water Cycle Study, it might also be helpful to reference the [Shared Standards for Water Efficiency in Local Plans](#) (published in June 2025) within the supporting text. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery.

The Shared Standards recommend that LPAs include Local Plan Policies that:

- Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible (a range between 85-95 l/p/d should be considered subject to viability).
- Require new, extended or redeveloped non-domestic<sup>1</sup> development to aim to achieve full credits in the BREEAM water calculator.
- Require new major non-domestic developments to include water saving measures and water reuse in their design.

These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy.

Tighter water efficiency standards that can be justified by evidence set out in the annexes supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that:

- The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations (i.e. non-domestic water restrictions).
- Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SSSIs in the Shared Standards area, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures.

**As a partner to the Shared Standards, we would encourage the policy to go further in respect of developments of less than 100 dwellings, to use a water efficiency standard within the range set by the Shared Standards i.e. 85-95 l/p/d.** It is noted that other emerging local plans across the WRE region are bringing forward tighter water efficiency standards within this range, dependent on viability. We would direct the GCSPS to review the recent Inspector's Report on the Uttlesford District Council Local Plan, where the tighter standard of 90 l/p/d for all new residential development has been demonstrated to be sound.

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

Anglian Water welcomes the approach to integrated water management in clauses 1 and 2. This supports the delivery of water smart communities where water is integral part of good place-

making and essential for the delivery of wider outcomes, through the multi-functional benefits that can be achieved by SuDS as part of green and blue infrastructure networks.

### **Sustainable Drainage Systems (SuDS)**

Anglian Water supports the application of the surface water drainage hierarchy - this is an essential pre-requisite to Anglian Water accepting a surface water drainage strategy together with agreement by the Lead Local Flood Authority (LLFA). If the LLFA are satisfied that, based upon evidence, no other option is feasible then a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow.

We would seek for the policy to clarify that no surface water is discharged to a foul sewer or a combined sewer via a new connection. Where proposals include a redevelopment of a brownfield site or changed surface area draining to a combined sewer via an existing connection, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities set out in the surface water drainage hierarchy to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate.

**All surface and foul water flows should be separated. Under no circumstances will surface water be permitted to discharge into a separate foul sewer or to a combined sewerage system via a new connection. Existing connections to a combined sewer through redevelopment of a brownfield site, should provide betterment in terms of reduced flows to the combined sewer network.**

Anglian Water is responsible for surface water drainage in the public sewer system. Our sewer networks can become overwhelmed when flooding occurs, and new development should be located to minimise flood risk and mitigate surface water flood risk appropriately. Our [Flooding Incident Reduction Plan](#) is available on our website and sets out how we aim to mitigate flooding risks across our region. It is essential for the effective management of our operational risk that we ensure the risk posed from [surface water drainage](#) is clearly understood and taken into account by developers. Anglian Water has published [Surface Water Risk Management Guidance](#) that provides a comprehensive approach to how we will assess different types of site in terms of surface water connections. **We would welcome reference to our Surface Water Risk Management Guidance in the supporting text.**

The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be conducted by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected to our surface water network until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated.

Policy clause 4.e states that where reasonably practicable all hard surfaces should be permeable. We would agree with this policy requirement, with the exception that we would not support permeable surfacing over our existing assets as this can prove to be problematic for maintenance and repair of our assets and the effective operation of this type of SuDS. It is therefore important that where we have existing underground assets within a site, that these are incorporated in roads or public open space as part of the design layout, and permeable surfaces overlaying our assets is avoided.

#### **Water Quality**

Anglian Water fully supports the policy requirements to demonstrate that there is capacity in our wastewater network and receiving WRC to accommodate development proposals, set out in clause 6. We agree that some measures may need to be provided on site as part of the enhancement to the foul and/or surface water networks to incorporate wastewater flows from the proposed development. In addition, a development will also need to secure a sustainable point of connection to our surface water, foul or combined network.

We identify the need for sustainable points of connection into our network by using a complexity matrix that assesses factors such as pollution risks and CSO spills, surcharges of our network, existing flood potential and excess surface water flooding. If a site triggers a number of these risks, then our engineers will require a sustainable point of connection - these will be reflected in our planning responses with a request that the sustainable point of connection is specified in a recommended planning condition.

#### **Policy CC/FM: Managing flood risk**

Anglian Water supports the policy requirements to manage flood risk from all sources. We identified specific areas that were particularly at risk from sustained groundwater flooding following the significant extreme weather events during the autumn and winter of 2023/24. A number of multi-agency groups have been set up across the Anglian Water region in areas that were particularly impacted by surface water and groundwater flood events during this period. The multi-agency group covers Cambridgeshire South, covering Ickleton, Willingham, Fen Drayton, Cottenham, Horningsea, Orwell, and Thriplow. The purpose of the Multi-Agency Group (MAG) is to facilitate effective collaboration and coordination among various stakeholders involved in managing flooding within these areas. We therefore agree with clause 2.e where sites may require a Flood Risk Assessment if the land is subject to other sources of flooding, and development would introduce a use of higher flood risk vulnerability.

We particularly welcome clauses 1.c and 1.e that positively influence the potential for betterment and ensuring existing assets are not adversely impacted by proposals. As indicated in our response to Policy CC/W, our [Flooding Incident Reduction Plan](#) is available on our website and sets out how we aim to mitigate flooding risks across our region. It is essential for the effective management of our operational risk that we ensure the risk posed from [surface water drainage](#) is clearly

understood and taken into account by developers. Anglian Water has published [Surface Water Risk Management Guidance](#) that provides a comprehensive approach to how we will assess different types of site in terms of surface water connections. We support the reference to Anglian Water in the supporting text (4.47) and the need for early consultation with the responsible bodies for flood risk.

Anglian Water agrees that betterment must be provided on previously developed sites, as outlined in our response to Policy CC/W.

#### **Policy CC/RE: Renewable energy projects and infrastructure**

Anglian Water supports the policy to facilitate the delivery of renewable energy schemes. Anglian Water is always looking for ways to reduce our carbon emissions and become a fully net zero carbon business by 2030. Renewable energy is a key step towards our ambitious goal of becoming a carbon neutral business, and renewable energy schemes help to provide energy security and resilience for our critical infrastructure.

We use land at or close to our operational sites to create solar arrays and generate renewable energy. It is an efficient way of maximising the space we have. We are also trialling an energy storage solution that will allow us to store excess solar energy generated during the day in batteries and use it at other times, helping us to reduce our reliance on energy from the grid.

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

Anglian Water supports the aims of this policy. As a water and sewerage undertaker, our role is essentially linked to the water cycle and the circular economy is a fundamental element of how we can most efficiently and effectively treat and manage wastewater whilst delivering on our purpose to bring environmental and social prosperity to the region. We are committed to using renewable energies to minimise our carbon footprint to become a net zero business by 2030. We support the circular economy, as getting to net zero is highly reliant on a sustainable, low-carbon approach to treating and recycling our sludge through our bioresources activities.

In promoting water smart communities, we recognise the importance of recycling or reusing water in homes and businesses to facilitate sustainable use of water resources, helping to achieve nature recovery and enhance natural systems.

### **5 BIODIVERSITY AND GREEN SPACES**

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

Anglian Water has concerns regarding the proposed 20% Biodiversity Net Gain (BNG) requirement for major development set out in clause 2 of the policy. Whilst we recognise the intention behind targeting a higher net gain requirement than the mandatory 10%, to align with the Cambridgeshire Doubling Nature vision, we are concerned that applying the new target to Anglian Water developments would not achieve the intended outcomes.

BNG requirements cannot be met onsite for projects where Anglian Water is not the landowner as 30-year habitat management cannot be guaranteed. For example, linear pipeline schemes, such as the one being planned between Grafham and Cambridge, frequently cross multiple landownerships. These projects often have minimal impact on biodiversity, but when the full length of a scheme is considered, statutory BNG requirements (10%) are already significant. In cases where Anglian Water is the landowner, scope for achieving BNG onsite is limited by the needs of site operations and the need to consider future infrastructure upgrades. Consequently, Anglian Water's development projects do not reflect the cost assumptions made in the Greater Cambridge Draft Local Plan Viability Assessment, which only assesses costs against residential and commercial development. Whilst 20% may be viable for other development types where onsite BNG is feasible (such as new housing allocations), it does not reflect the realities of delivering water infrastructure projects.

The additional BNG units required under this proposal, will need to be sourced offsite, increasing costs to our customers and extending the timelines to deliver new water infrastructure. This additional burden does not consider the significant biodiversity and nature recovery benefits being delivered by our proposed infrastructure upgrades and WINEP schemes in AMP8 – which will help to deliver sustainable growth and improve the ecological quality of catchments and aligns with the Government's 25 Year Environment Plan ambitions and wider agenda.

**We request that the Council considers the impact of 20% BNG for all major development types, and the impacts this requirement would have on the timely delivery of essential infrastructure to support the Council's growth ambitions. We suggest that essential major infrastructure projects, where there is no scope for BNG onsite should be exempt from the 20% BNG requirement for major development.**

#### **Policy BG/GI: Green and blue infrastructure**

Anglian Water is supportive of the policy aims to provide a multifunctional green and blue infrastructure network, which will contribute towards improving biodiversity and facilitate nature recovery in alignment with the Cambridgeshire and Peterborough Local Nature Recovery Strategy (LNRS). Such measures will help communities adapt to climate change impacts through helping to reduce flood risk and improve water quality through SuDS and other nature-based solutions.

The Government has challenged water companies to increase their investment and to improve environmental outcomes by 2030, Anglian Water will be investing in river restoration projects between 2025 to 2030 to enhance and protect our rivers, nurture wildlife and restore important habitats for future generations to enjoy and explore. River restoration is just one small part of a wider program to improve the environment which is part of our Water Industry National Environment Program (WINEP) Asset Management Plan (AMP8) - which includes measures to reduce nutrients from the discharges at some of our Water Recycling Centres (WRCs) within the Greater Cambridge area.

These ambitious measures have been set by the Environment Agency. Anglian Water are looking to work with landowners to help deliver river restoration on 16 rivers across the region, these have been identified by the Environment Agency as our region's most important rivers and streams. Our WINEP programme will help achieve wider nature recovery ambitions identified in LNRSs across our region.

In addition, our [Advanced WINEP](#) (A-WINEP) investment aims to demonstrate an approach to maximise value by going even further for the environment through partnership working (including co-development and co-funding), focus on the use of nature-based solutions, implementing solutions to water management challenges at scale, and improved multi-stakeholder governance. The A-WINEP has clear potential to contribute to some of the biodiversity priorities and strategic opportunities which relate to rural regeneration (nature-based solutions and land management) within the LNRS area.

The A-WINEP region of interest extends to 11 river catchments that include the Cam Lower, and the Cam, Rhee and Granta within the LNRS area. Catchment Plans will be created for the initial 11 catchments within the [A-WINEP rural regeneration programme](#), which will be developed over the full duration of the A-WINEP and will provide a holistic approach to catchment regeneration.

Projects that seek A-WINEP match funding must address two primary outcomes:

- the reduction of nutrient pollution into rivers and
- mitigating the impact of low flow.

It is considered that our A-WINEP rural regeneration programme will help deliver the strategic aims identified in the LNRS – particularly around climate change, internationally important chalk streams, and water quality and resources.

#### **Policy BG/TC: Improving tree canopy cover and the tree population**

Anglian Water supports the policy requirements to facilitate opportunities for increasing tree canopy cover in new developments, including redeveloped sites and regeneration schemes. Improvements to green infrastructure and planting to reduce surface water run-off are direct benefits that can be achieved by planting the right tree in the right place. However, as set out in our response to Policy BG/BG, it would be impractical for major infrastructure schemes such as a new pipeline to achieve this requirement. We request that the supporting text clarifies the circumstances where major development (e.g. Residential/commercial/mixed-use) are expected to achieve 30% tree canopy cover on site.

We would request that the policy also references under clause 4, where new trees are provided, that **consideration must be given to the potential conflict between new trees and built form, and be compatible with existing or planned underground utilities (such as sewers)**. There will be certain types of development, where trees are not an appropriate solution i.e. wetland creation, but alternative ecosystem services are delivered.

For trees to thrive they need space for root development in the underlying soil, which must be of sufficient capacity to accommodate the rooting habits of the species, without impacting on the functioning of our underground assets. A sewer or lateral drain should not be located closer to trees/bushes/shrubs than the canopy width at mature height, except where special protection measures are provided - such as use of appropriate barriers to resist root ingress to the sewer system. The strategy should consider both the growth of tree roots and increased heave and ground movement due to climate change. A tree should not be planted directly over sewers or where excavation onto the sewer would require removal of the tree. To minimise the risk of root damage, tree planting should provide good growing conditions. Guidance can be found in 'Trees in Hard Landscapes: A Guide for Delivery'.

Anglian Water can also provide guidance for developers in considering sewer design and location which should inform tree protection steps and utility construction.

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

In delivering essential infrastructure to address both surface water and wastewater drainage, Anglian Water will, as a consequence of our statutory responsibilities, need to develop within the riparian buffer zone for certain types of essential infrastructure development. We consider that the need for this can be demonstrated, but we would request that the policy is amended to include essential infrastructure within clause 2.

"...Within these riparian buffer zones, no development shall be permitted except for domestic extensions, soft landscaping, small amenity areas, or proposals where it is necessary for the nature and function of the development **such as essential infrastructure requirements**. In these exceptional cases, details proportionate to the scale and nature of the development must be submitted for approval to demonstrate:"

#### **Policy BG/PO: Protecting open spaces**

Protected Village Amenity Areas or areas identified as Local Green Space should not include any Anglian Water assets such as sewer pumping stations, which may require future development/expansion to address matters such as capacity issues.

### **6 WELLBEING AND SOCIAL INCLUSION**

#### **Policy WS/NC: Meeting the needs of new and growing Communities**

Anglian Water is supportive of the policy approach which enables onsite delivery of services and facilities in new communities. This provides flexibility and offers different options and pathways for delivering key infrastructure that may better align with the pace of development and viability - depending on the specific circumstances and challenges the new community might present. We agree that such provision should be determined in consultation with the service providers and, where necessary, relevant regulators. For example, if a new settlement delivers an onsite water

recycling centre subject to the necessary discharge consents, Anglian Water will consider adopting the facility if certain design and operational requirements are met.

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

Anglian Water supports the policy section regarding environmental nuisance/pollution and the agent of change principle. We consider that this provides a robust approach to managing development proposals for sensitive uses, including residential development, near our water recycling centres or sewer pumping stations, to ensure such proposals do not put at risk the operation of our existing infrastructure, and that the Agent of Change Principle will apply.

Our assets such as water recycling centres and pumping stations can be a source of odour and noise that may impact on sensitive receptors such as in proposed residential developments - we have developed guidance on asset encroachment which can be found on our [website](#). The Cambridgeshire and Peterborough Minerals and Waste Local Plan, Policy 16, also refers to consultation areas (CAS) around water recycling areas to ensure development will not prejudice the existing or future use of the area, and a presumption against allowing development that would comprise buildings regularly occupied by people or land for regular community use.

Our water recycling centres are generally long-established uses within an area, and whilst there cannot be a simple presumption against all development, building close to these operational wastewater sites may not always be in the best interests of people who would have to live or work there in the future.

### **7 GREAT PLACES**

#### **Policy GP/PP: People and place responsive design**

Anglian Water is supportive of clause 1.c to ensure new development supports the climate emergency response. We consider it would be useful to include the term 'operation' as new buildings using less energy and potable water are a factor of its operation rather than delivery or maintenance.

c. Being designed to be long lasting and low impact in delivery, [operation](#) and maintenance without compromising design quality.

#### **Policy GP/QD: Achieving high quality development**

**Anglian Water requests that clause 2.i also includes utilities, as it is important that existing utilities are factored into the layout and design of new development.** Our existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewerage assets should be sited within highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.

- i. [Ensure the layout and design of development successfully incorporates functional needs such as \*\*utilities\*\*, waste storage, recycling and bicycle parking, in a way that does not negatively impact on neighbouring amenity;](#)

Anglian Water recognises that the Councils may wish to include this policy requirement in a different policy or refer to utilities infrastructure more generally in the supporting text to the policy. This also includes proximity to assets such as sewer pumping stations that might already be located within or adjacent to the development or are required on site.

#### **Policy GP/HD: Housing density**

Development density is a key factor in delivering community scale rainwater reuse schemes. The report [Water reuse in new housing: Understanding the business case](#) published on the EWSC website identifies the benefits of examining in greater detail the relationship between development density and the respective cost of community versus on-plot installations, due to the significance of external pipework costs as a component of the total cost within community systems. Community scale systems yield cost savings over on-plot reuse above densities of around 60 units/ha - concluding that it is density, not size of development which is the deciding factor.

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

Anglian Water welcomes reference to the inclusion of green and blue infrastructure as one of the key factors to achieving high quality development. Whilst there are separate policies regarding open space, SuDS and green and blue infrastructure in the draft plan, it is important to emphasise that these features are critical to achieving successful place-making and climate resilience.

Clause d.iv requires the provision of public art on all major development proposals and paragraph 7.46 states that "all forms of major development are required to make provision for public art".

**Anglian Water objects to this policy requirement and would request that this clause should be more specific to the types of major developments that most appropriately apply to this clause and exempt essential utilities infrastructure from public art provision unless there are compelling reasons to justify this.**

We do not consider that the provision of public art should apply to major utilities infrastructure as amenity and landscape matters relating to our new utility infrastructure are addressed through identified mitigation measures following technical assessment such as new landscaping and do not require public art to ameliorate impacts. Our investments use public money funded through customer bills, and additional provision of, or contributions to, public art would not be considered value for money. Most of our above ground infrastructure such as water recycling centres (or extensions thereof), pumping stations, water treatment works, and service reservoirs are not in locations which are routinely visited by or indeed often seen by the public. They are operational areas with strict security requirements and are generally located on the edge of, or outside settlements. Further, Anglian Water provides essential wastewater and water supply infrastructure, including underground assets such as sewers and water supply pipelines. Funding

for new infrastructure outlined in our Business Plans, is agreed with Ofwat our economic regulator, under specific financial metrics methodology, which sets the parameters for spending. We have raised similar concerns in our representations to the Greater Cambridge Planning Obligations SPD.

Whilst paragraph 7.48 sets out that exemptions may apply where public art requirements do not meet the tests for planning obligations in paragraph 58 of the NPPF, this means that water companies and other utilities providers would have to specifically make the case for this in each planning application, when the local plan could provide the clarity sought.

## 8 JOBS

### Policy J/NE: New employment development proposals

### Policy J/PB: Protecting existing business space

Anglian Water notes Policy J/PB seeks to retain existing employment sites and premises, and any loss would only be permitted where the site is allocated for an alternative use in the Local Plan (or a Neighbourhood Plan). As previously referenced, one of the current key priorities for Anglian Water to facilitate sustainable growth is to bring forward a phased scheme to increase the capacity to treat wastewater at our existing Cambridge WRC site, following the withdrawal of government funding to relocate the works to the north of the A14 under the CWWTPR DCO.

We recognise that this will have implications for the current North East Cambridge site allocation, and this will have a bearing on future policy direction in the emerging Local Plan, potentially including the identification of Strategic Industrial Estates, or other employment opportunities within the North East Cambridge area defined by Policy J/NE.

## 10 INFRASTRUCTURE

### Policy I/SI: Safeguarding important infrastructure

#### CWWTPR

Anglian Water considers that until such time as the opportunity to deliver the CWWTPR expires, the Local Plan should recognise the CWWTPR project. **We request that the policy provides appropriate safeguarding of the consented relocation site and this is appropriately identified on the Policies Map.**

We would welcome the opportunity to discuss the inclusion of a safeguarding clause with the Greater Cambridge Shared Planning Service.

### Fens Reservoir Nationally Significant Infrastructure Project

As the Councils are aware, the **Fens Reservoir is a project of national significance for new water resources**, which will provide water supply to Anglian Water and Cambridge Water customers. The reservoir will be determined under the Planning Act 2008 as a Development Consent Order.

The need for the reservoir was established in our Water Resources Management Plan 2020-2045 (WRMP19) and taken forward in our most recent Water Resources Management Plan for 2025-2050 (WRMP24), and Cambridge Water's final WRMP together with other interim strategic supply options including potable water transfer interconnectors to support the long-term supply demand balance for water resources across our region; providing drought resilience and environmental protection. It is positive to see that paragraph 1.10 of the emerging draft local plan acknowledges the vital role the Fens Reservoir will play in securing long-term water supply and resilience for the region. It is noted that this paragraph states the Reservoir will be operational between 2035 and 2037 and Paragraph 2.82 acknowledges that the Fens Reservoir will further increase water supplies from the mid 2030's. As set out in our Phase Three Consultation (Autumn 2025) it is anticipated that the earliest date that the Fens Reservoir would be operational is 2036.

### **The Fens Reservoir**

The Fens Reservoir is being progressed through the formal regulatory process established by the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process, recognising the need to plan long term for our region's future water needs.

The Fens Reservoir will be located to the north of Chatteris. It will take surplus water when it is available in the environment and store it until it is needed by customers. The Reservoir itself is located in Fenland District, but elements of the transfer corridor and associated infrastructure will be located in South Cambridgeshire District as described below.

The preferred route of the associated water infrastructure (comprising treated water pipelines) runs through the northwestern part of South Cambridgeshire, as shown on the accompanying plan (South Cambridgeshire Area Plan).

### **Fens Safeguarding Policy**

Our Fens Reservoir project will continue to evolve and given its strategic nature, Anglian Water requests that the preferred route for this associated water infrastructure and the preferred location of the service reservoir at Madingley are safeguarded from inappropriate development in order that the delivery of this project of national significance is not compromised.

We would therefore like to request that a specific safeguarding policy relating to the Fens Reservoir project as it affects South Cambridgeshire is included in the Greater Cambridge Local Plan. The following wording is suggested:

### **Proposed Fens Reservoir and Associated Water Infrastructure**

**Land to the South and West of Madingley, West of Dry Drayton, East of Cambridge Services and West of Swavesey will be safeguarded for the delivery of associated water infrastructure relating**

to the Fens Reservoir project. This will comprise raw and treated water transfer pipelines and new abstraction infrastructure, alongside the provision of a new service reservoir.

Development that might prejudice the implementation and subsequent operation of this water infrastructure within the safeguarded area will be refused. The safeguarded areas for the water infrastructure are shown on the Adopted Policies Map.

We would welcome the opportunity to discuss the inclusion of a safeguarding policy further with the Greater Cambridge Shared Planning Service.

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

Anglian Water supports the policy requirements to ensure that infrastructure capacity is available or can be made available in time to serve the development, including the submission of a phasing strategy to align with the timing of additional infrastructure investment. We agree that a Utilities Statement should support this to provide details including foul and surface water drainage and details of any engagement and agreements made. We encourage developers to undertake early engagement with Anglian Water including the submission of pre-planning enquiries to establish sustainable points of connection to our combined, surface water, and foul drainage networks, and capacity at our WRCs. We provide detailed information on our [website](#) on how developers can apply for these assessments based on those which best suits the development.

Noting the requirements for developers, in submitting accompanying statements to support development proposals, it should be clear that separate surface water drainage strategies may be prepared and the Sustainability Statement would also lead to submissions regarding potable water supply and water efficiency. The local plan could help to clarify how these additional statements should be incorporated and prepared, as they may in some circumstances become signposts to other documents on larger schemes, or for smaller/minor developments, become part of the Planning Statement.

## 4. Conclusion

- 4.1. Anglian Water welcomes the opportunity to contribute comments on the Draft Local Plan for Greater Cambridge. We consider that the Plan is well set out with in relation to managing flood risk, surface water and wastewater, and enabling water efficiency. We recognise the challenges for meeting the uplift in housing requirements and the infrastructure required to help deliver future growth across the Greater Cambridge area, with the main focus being Cambridge and the new towns.
- 4.2. We look forward to continuing our positive and proactive discussions with the Councils in respect of our comments and the next iteration of the Local Plan, including supporting updates to the evidence base as and when required.