



British Land

Land at South Trumpington, Cambridge

Water Management Strategy

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Contents

Water Management Strategy	1
1. Executive Summary	3
2. Introduction	3
3. Purpose of the Report	3
4. The Vision for South Trumpington	4
5. The Opportunity	4
6. The Site	4
7. Policy Framework	4
8. The Baseline Position	7
9. The Likely Impacts of the Opportunity	7
10. The Approach at South Trumpington	8
11. Conclusion	11

1. Executive Summary

- 1.1.1. The Cambridge water resources zone has experienced greater-than-forecast increases in demand for water over recent years. Climate change, an increasing population and increased personal consumption are increasing the demand for potable water which, within many parts of the UK, is a finite resource.
- 1.1.2. Cambridge is located in a seriously water stressed region. Cambridge Water must reduce current abstraction rates from the chalk aquifer to avoid a deterioration in the water environment. With no new strategic supplies available in the area until 2032, reducing existing demand is the only viable option to facilitate the new development required to achieve the Government's local economic stimulus ambitions.
- 1.1.3. British Land's ambition for the Illustrative Development Option is:
- 1.1.4. *"In developing this project, our vision is to create a development that not only enhances water security but also actively engages residents in sustainable practices, fostering a sense of shared responsibility. By implementing cutting-edge water management technologies and promoting environmentally conscious behaviours, we aim to protect the local ecosystem while building a resilient community. This development will serve as a model for future sustainability-driven projects, contributing to the long-term well-being of the region."*
- 1.1.5. The integrated water management strategy for the Illustrative Development Option responds to the water scarcity challenge in Cambridge and will deliver a scheme that incorporates the use of highly efficient fixtures and fittings, greywater recycling and reuse supplemented with rainwater harvesting as required, smart metering, and a behavioural change campaign to embed long-term and sustainable reductions in water consumption.

2. Introduction

- 2.1.1. This water management strategy focusses on potable water and has been prepared on behalf of British Land in support of the Greater Cambridge Local Plan 'Sites Submission Consultation' exercise.
- 2.1.2. The promoter, British Land, owns the Site at South Trumpington, Cambridge and are committed to promoting the Site through the emerging Greater Cambridge Local Plan.
- 2.1.3. British Land have a strong reputation for delivering state-of-the-art developments, in the best strategic locations, built and managed to British Land's industry-leading standards. They do this by bringing together their unique expertise in the delivery of complex developments, as well as their award-winning sustainability practices.
- 2.1.4. The submission, which this document forms part of, demonstrates that the Site is suitable, achievable, and deliverable for allocation and, ultimately, development, subject to future planning permission(s).
- 2.1.5. This submission replaces all technical information provided to Greater Cambridge by the previous landowner (Grosvenor).

3. Purpose of the Report

- 3.1.1. The purpose of this report is to support British Land's response to the Sites Submission Consultation as part of the emerging Local Plan process. The report details initiatives that would be considered to reduce water demand across future development at the Site during construction, design and throughout the occupancy life cycle.
- 3.1.2. The report:
 - Summarises the applicable policy framework.
 - Examines the baseline conditions.
 - Appraises the Opportunity.

- Sets out the likely water demand requirements.
- Identifies the embedded design elements that reduce the water demand and respond to the policy framework.

3.1.3. This report concludes that the Illustrative Development Option would be a highly water-efficient scheme that would minimise demand on the potable network, would promote water recycling and reuse, and would deliver a water demand benchmark for future sites.

4. The Vision for South Trumpington

4.1.1. The Vision is to provide an exemplar and deliverable growth proposition for Cambridge, offering a rich mix of uses to potentially include, floorspace for a wide range of jobs (Offices, Science and Technology, R&D, Mid-Tech), a range of housing types including affordable and/or essential worker housing, community facilities, mobility hubs and complementary retail and workspace. There is an opportunity to extend the Country Park and provide routes through, connecting into the neighbouring Trumpington Meadows local centre.

5. The Opportunity

5.1.1. The Opportunity is to provide a deliverable growth proposition for Cambridge: a mixed-use urban extension comprising a range between 400-1,000 homes and up to 260,000 sq. m (GEA) of other floorspace including flexible employment uses and supporting infrastructure. The range of floorspace and land use is necessary for flexibility at this early stage of the planning process as explained more fully in the supporting 'Vision Document' (AAM) and will be explored further through design evolution and pre-application discussions with Greater Cambridge Shared Planning Service (GCSPS).

5.1.2. To inform the submission, an Illustrative Development Option has been prepared. The Illustrative Development Option as shown in the Vision Document represents a commercially led, mixed-use proposal for the Site (approximately 225,000sq.m GEA and approximately 400 homes). The proposals have the scope to change throughout the process up to the maximum range (of above), subject to design evolution, viability and/or securing additional grant funding. The Opportunity seeks to promote the Site for Use Classes B, E, F, C1, C3 and Sui Generis.

6. The Site

6.1.1. The Site comprises a single parcel of agricultural land separated into smaller parcels by existing hedgerows and extends to approximately 30.1 hectares. The Site is also dissected by a cycle path that links Trumpington to the village of Harston to the south.

6.1.2. The Site is relatively flat, with a gentle fall west to east, but can appear to raise when looking eastwards from the west/northwest edges of the site.

6.1.3. The Site is located to the southwest of Cambridge City Centre. Land to the west of the Site forms Trumpington Meadows Country Park. To the south is the M11, beyond which is currently agricultural but is the site of the South West Travel Hub (SWTH) facility. To the east is the A1309 Hauxton Road, and land further east is also in agricultural use. To the north is the development of Trumpington Meadows, which continues to be developed. Part of the Site is currently used as construction welfare/ logistics associated with Trumpington Meadows.

7. Policy Framework

7.1. Overview

7.1.1. The key elements of the policy framework that apply to the Illustrative Development Option are summarised below. The implications for the scheme are discussed in Section 9, with proposed mitigation measures outlined in Section 10.

7.2. Cambridge Water Abstraction Licence Capping

- 7.2.1. Following a review of existing abstraction levels in the Cambridge water resource zone, the Environment Agency applied abstraction licence caps. These prevent an increase in abstraction, to avoid any further deterioration in the water environment. This resulted in an immediate imbalance in Cambridge Water's supply options compared to projected increased potable demand from new developments. The licence capping has therefore introduced potential constraints on the number and volume of new potable water connections and will require developments to be highly water efficient.

7.3. National Policy and Guidance

- 7.3.1. On 19 December 2023, the then Secretary of State for Levelling Up, Housing and Communities issued a Written Ministerial Statement¹ (WMS) which stated:
- 7.3.2. *'And we must also ensure we have an approach towards water that reflects the nature of Cambridge's geography. So today I am also announcing that we will review building regulations in Spring next year to allow local planning authorities to introduce tighter water efficiency standards in new homes. In areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes, I encourage local planning authorities to work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres per day that is set out in current guidance.'*
- 7.3.3. The Cambridge local authorities may therefore work with the Environment Agency to introduce stricter water efficiency targets for new developments.
- 7.3.4. Defra commissioned the Future Homes Hub to develop a roadmap² to reduce the existing water usage standard for water stressed area from 110 litres per person per day (lppd) to 90lppd by 2025 and to 80lppd by 2035.

7.4. Water Industry Regulation

- 7.4.1. Cambridge Water (CW) has an obligation to provide new potable water supplies to residential developments. However, under Section 55 of the Water Industry Act 1991³, CW is not legally obligated to provide water supplies for non-domestic applications.
- 7.4.2. Cambridge Water's Developer Services Charges Arrangements (2025/26)⁴ published in February 2025 notes that Cambridge has experienced faster than forecast growth in the non-household sector which, in conjunction with significant reductions to current abstraction volumes, means that further demand pressures risk making abstractions unsustainable. Consequently, the document notes:
- 7.4.3. *'we will be applying an enhanced assessment of new non-household connection requests from 2025. Requests for connections that will require less than 20m³/day will be approved, as will requests where the primary use of the water required is for domestic purposes e.g. hospitals and schools. However, **for connection requests above 20m³/day and where the primary use is not for domestic purposes (e.g. sanitation, cooking etc), it is likely that we will not be able to facilitate connection and supply to these developments until 2032.** We would encourage all developers to contact us as early in your process as possible so that we can support and advise on the likely outcome of your request, as well as helping you to identify opportunities to reduce water consumption and/or achieve water neutrality. Through this early engagement we can ensure connection requests are enabled as early as possible, linking to build out rates and offsetting activities.'*

¹ The Next Stage in Our Long Term Plan for Housing Update, Statement made on 19 December 2023, Statement UIN HCWS161, [online]. Available at: <https://questions-statements.parliament.uk/written-statements/detail/2023-12-19/hcws161> [Accessed 01/02/2025].

² Future Homes Hub (2024), Water Ready: A report to inform HM Government's roadmap for water efficient new homes, [online]. Available at: <https://www.futurehomes.org.uk/future-homes-hub-water-efficiency-report> [Accessed 01/02/2025]

³ Water Industry Act 1991, Part 3, Chapter 3. Available at: https://www.legislation.gov.uk/ukpga/1991/56/pdfs/ukpga_19910056_en.pdf [Accessed 01/02/2025].

⁴ <https://www.cambridge-water.co.uk/media/ncvewoer/developer-services-charging-arrangements.pdf>

- 7.4.4. Non-household non-domestic demand would consist of any process water for a non-household premises. In the context of the Illustrative Development Option this is likely to apply to the water demand for use in laboratories.

7.5. Water Efficiency (Residential)

- 7.5.1. Residential water efficiency standards are being progressively tightened to address increasing concerns over water scarcity and sustainability. Regulation 36 and Part G of the Building Regulations 2010 specified a new dwelling water efficiency target of 125lpd with an optional tighter target of 110lpd⁵ that can be secured by a planning condition.
- 7.5.2. The Environment Agency's classification of areas as seriously water stressed⁶ permits the relevant local authorities to adopt the tighter standard of 110lpd for new developments. The Cambridge region was classified as seriously water stressed in the 2021 classification.
- 7.5.3. Both the Cambridge Local Plan (2018) and South Cambridgeshire Local Plan (2018) adopted the 110lpd target.
- 7.5.4. Defra is currently undertaking a review of the Building Regulations 2010 target applicable to water stressed areas, and it may be reduced from 110lpd to 80lpd.
- 7.5.5. A water consumption target of 85lpd is already required for new dwellings in the water stressed Sussex North water resource zone. It is understood that a target of 80lpd may be under consideration in Cambridgeshire, reflecting the local water scarcity challenge.
- 7.5.6. Despite the 110lpd standard being widely implemented, an audit⁷ of properties built to that standard determined that none complied, and the average per capita consumption was calculated to be 135lpd. This demonstrates the value of post-construction and pre-occupation water audits to ensure that properties are built to the design standard.

7.6. Water Efficiency (Non-Residential)

- 7.6.1. Non-residential water efficiency policies are less mature compared to residential standards but are rapidly evolving. The UK government has set a target of a 9% reduction in non-household water consumption in England by 2037-38 compared to 2019-20 levels⁸.
- 7.6.2. Policy CC/4 of the South Cambridgeshire Local Plan (2018) adopted a minimum non-residential water consumption target of two credits under the BREEAM WAT01 Water Consumption standard⁹, representing a 25% reduction from the baseline. In contrast, Policy 28 of the Cambridge Local Plan (2018) adopted a target of five BREEAM WAT01 credits, equivalent to a reduction of 55% from the baseline.
- 7.6.3. Related BREEAM standards for best practice water management include WAT02 Water Monitoring, WAT03 Water Leak Detection and WAT04 Water Efficient Equipment.

7.7. Sustainable Drainage Systems (SuDS)

- 7.7.1. Schedule 3 of the Flood and Water Management Act 2010 (FWM Act)¹⁰ provided a mechanism to increase the development of sustainable drainage systems (SuDS) in new developments by removing the automatic right of connection to surface water sewers. It also provided for local authorities to create SuDS Approval Bodies (SABs) to review and approve SuDS designs, and to adopt SuDS for new developments. Implementation of Schedule 3 has been significantly delayed.

⁵<https://www.legislation.gov.uk/ukxi/2010/2214/regulation/36>

⁶<https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

⁷ <https://database.waterwise.org.uk/wp-content/uploads/2024/03/TCON-11242-Building-Regulations-Water-Efficiency-Review-Report.pdf>

⁸ <https://www.gov.uk/government/publications/a-review-of-englands-draft-regional-and-water-resources-management-plans/19b2f89b-e5ad-4387-afab-884c275437ee>

⁹ <https://breeam.com/>

¹⁰ [Flood and Water Management Act 2010](#)

- 7.7.2. In the interim, the National Planning Policy Framework (NPPF) was amended in 2012 such that major developments *should* incorporate SuDS unless considered inappropriate.
- 7.7.3. Policy 31 of the Cambridge Local Plan (2018) specifies a range of SuDS requirements including the management of water close to its source, water sensitive design, the adoption of green and brown roofs, recycling and reuse, and the design of SuDS in compliance with the SuDS Manual (CIRIA C753). Policy CC/8 of the South Cambridgeshire Local Plan (2018) outlines similar requirements. The SuDS policies reflect an integrated approach to water management that mitigates flood risks while enhancing biodiversity and water quality.
- 7.7.4. The government announced in 2023 that Schedule 3 of the FWM Act will now be implemented and the SAB review and SuDS adoption processes are in development.

8. The Baseline Position

- 8.1.1. The baseline water demand for the Illustrative Development Option has been estimated as approximately 239,000m³/year.
- 8.1.2. The household demand has been estimated based on a resident population of 1,109 with a daily water demand of 110 litres each. This generates a household demand estimate of 44,556,850 litres per year (or approximately 45,000m³/year).
- 8.1.3. The non-household demand has been estimated using publicly available sector-specific water use data and the estimated gross external areas of each building type. This generates a total non-household demand estimate of approximately 194,000m³/year.
- 8.1.4. Cambridge Water's Developer Services Charges Arrangements imply that non-household developments that have a water demand of over 20m³/day that is *primarily for domestic purposes* will be approved. While they provide examples such as hospitals and schools, the water demand from the non-household elements of the Illustrative Development Option is likely to be primarily associated with offices, logistics, mid-tech, a hotel, retail/leisure/food & beverage and special uses. Much or all of the water demand associated with these use classes *may* be classified as domestic – this will need to be discussed and agreed with Cambridge Water.
- 8.1.5. The estimated non-household demand of 194,000m³/year has been split into the estimated water demand for domestic purposes (i.e. sanitation, cooking) of approximately 128,000m³/year (all water demand for all building types excluding laboratories) and the water demand for non-domestic purposes of approximately 66,000m³/year (only laboratory process water).
- 8.1.6. The estimates are indicative only and will require refinement during later stages of the project.
- 8.1.7. The classification of domestic and non-domestic demand will require discussion and agreement with Cambridge Water, in accordance with their recently published Developer Services Charges Arrangements

9. The Likely Impacts of the Opportunity

- 9.1.1. The estimated household domestic water demand (of 45,000m³/year) will increase demand on Cambridge Water's potable supply network. Water efficiency measures will be incorporated into the building designs to reduce the total demand as far as practicable.
- 9.1.2. Once the household demand has been minimised, the residual demand may need to be offset through the purchase of water credits from the government's Cambridge credits scheme (currently under development).
- 9.1.3. The estimated non-household domestic water demand (of 128,000m³/year) will also increase demand on Cambridge Water's potable supply network. The demand would be minimised through the design process and adoption of high levels of performance against BREAAAM water standards. The residual non-household domestic demand (that cannot be further reduced) may need to be offset until 2032.

- 9.1.4. The estimated non-household non-domestic water demand of 66,000m³/year (for laboratory process water) equates to an average consumption of 181m³/day. This exceeds the 20m³/day threshold detailed in Cambridge Water's Developer Services Charges Arrangements. Cambridge Water may therefore not be able to provide a connection and supply for this element of the development.
- 9.1.5. It may not be possible to significantly reduce the estimated non-household non-domestic demand through adoption of BREEAM standards, although the laboratory fit-out would be designed to maximise water efficiency.
- 9.1.6. Alternative water sources would be considered to supply or offset the non-household non-domestic water demand, including the use of greywater recycling and/or rainwater/stormwater harvesting.
- 9.1.7. Consideration would be given to modifying the proposed mix of building types and footprints of the Illustrative Development Option during later stages of the project to further reduce the household and non-household water demand.
- 9.1.8. The household and non-household water demand estimates for the Illustrative Development Option would be discussed with Cambridge Water as early as possible during the design and planning process.

10. The Approach at South Trumpington

10.1. Overview

- 10.1.1. Reflecting the water scarcity challenge in Cambridge, British Land's vision is for an integrated water management strategy that focuses on reducing water demand across the site in both commercial & domestic properties, supplemented with water recycling and re-use, and a long-term sustainability strategy.
- 10.1.2. The strategy envisages:
 - The installation of highly water efficient fixtures & fittings into all properties to achieve a low water consumption standard.
 - Achievement of the highest BREEAM standards for non-household properties.
 - A holistic water-sensitive urban design framework, integrating SuDS with green infrastructure and climate resilience strategies.
 - A greywater reuse system, potentially supplemented with a rainwater/stormwater harvesting system.
 - Water audits of properties prior to occupancy.
 - Best in class smart metering including sub-metering.
 - A comprehensive customer campaign on water scarcity & efficiency.

10.2. Domestic Properties

- 10.2.1. British Land's aspirations to minimise domestic property potable water consumption include:
 - Residential property designs to comply with and improve on the relevant water consumption targets.
 - Working with suppliers to develop a comprehensive database of the most water efficient fixtures and fittings available in the market. This would take into consideration the UK

mandatory water efficiency labelling scheme¹¹. If the legislation is delayed, the most efficient fittings would be installed to satisfy future regulation. Use of the database would be mandatory for all developers, to ensure that properties are designed and fitted-out to minimise water consumption.

- Domestic properties with gardens to be supplied with a water butt to capture and reuse rainwater. This is not only a practical application of reuse but would also promote water reuse and the value of water to residents; this would be supported with a behavioural change campaign.
- Consideration of the development of drought resistant garden designs, providing residents with the opportunity to further reduce external water consumption.
- A behavioural change campaign to provide residents with water efficiency advice, a manual containing advice on the maintenance of their water assets to prevent future water leaks and to maintain high levels of asset longevity.

10.3. Commercial Properties

10.3.1. British Land's aspirations to minimise commercial property water consumption include:

- Domestic fixtures and fittings within commercial properties to be selected from the comprehensive database detailed above.
- All non-domestic commercial spaces to be fitted with the most water efficient fixtures and fittings to minimise the non-household non-domestic demand.
- All commercial properties to be designed to achieve five credits plus one exemplary performance credit under the BREEAM WAT01 water consumption standard. This would reduce non-household domestic water demand by up to 65% from the baseline. This would require adoption of water efficient design and water recycling and reuse approaches.
- All commercial properties to also be designed and operated to achieve the BREEAM standards for best practice water management – WAT02 Water Monitoring, WAT03 Water Leak Detection and WAT04 Water Efficient Equipment. This would ensure effective management and the minimisation of water leakage and wastage throughout the lifecycle of the buildings.
- A clear and detailed maintenance regime to be agreed with facilities managers across all commercial sites.

10.4. Water Efficiency Audits

10.4.1. British Land's vision includes an ambition to undertake post-construction and pre-occupation water audits of a representative sample of domestic properties to assess as-built compliance with the agreed design standards. Where the audit outcomes identify a departure from the design standards, British Water would liaise with the relevant developers to address the departures.

10.4.2. As part of their vision for water, British Land would seek that all commercial properties will be audited against the BREEAM standards to ensure that they achieve the design standard of five credits plus one exemplary performance credit for WAT01, and compliance with WAT02, WAT03 and WAT04.

¹¹ <https://www.gov.uk/government/news/household-goods-to-carry-water-efficiency-labels>

10.5. Water Recycling and Reuse

- 10.5.1. A greywater water recycling and reuse scheme, with or without supplementation from a rainwater/stormwater harvesting scheme, will be integrated into the Illustrative Development Option. The scheme will be compliant with BS 8525-1:2010 Greywater Systems - Part 1 Code of Practice.
- 10.5.2. The scheme will include a filtration system (reverse osmosis/membranes) with a disinfection system based on sodium hypochlorite dosing. The automated system will supply non-potable water through a dual reticulation system (with air gaps to potable water systems) to provide supplies to landscaped areas, domestic gardens, toilets and to supply or offset the non-household non-domestic demand.
- 10.5.3. Consideration will also be given to whether recycled water could be treated to the standard required for use in the laboratories, to offset their non-domestic demand.
- 10.5.4. The system will be based on current best practice and will include remote SCADA (supervisory control and data acquisition) operation¹². The treatment plant will be fully automated with a failsafe design and will include a potable water back up system.
- 10.5.5. Based on design standards still to be finalised, the system will consist either of one modular centralised treatment plant that will permit scaling to match the build-out phasing, or several smaller units located around the site and developed according to the construction phasing.
- 10.5.6. Both the centralised and de-centralised systems would require provision of a dual reticulation network to supply non-potable water to dwellings and commercial properties.
- 10.5.7. The system would be operated through a service agreement with a suitably qualified and experienced contractor (and/or manufacturer). A comprehensive operations and maintenance plan would be developed, and a comprehensive TOTEX funding arrangement will underpin continued operation.
- 10.5.8. In addition to providing an efficient option for non-potable water provision, the greywater recycling scheme would also reduce the foul flow loading on the wastewater infrastructure.

10.6. Smart Metering

- 10.6.1. All domestic and commercial properties will be fitted with smart water meters that support automated and high frequency (every 15 minute) data collection. This will permit analysis of consumption, the rapid and automatic identification of leaks, and provide real-time feedback and information to customers, often through a phone app.
- 10.6.2. Smart water meters can reduce water consumption by up to 20%, offering potential water bill savings¹³.
- 10.6.3. The installation of smart water meters in commercial buildings will support accreditation with BREEAM standards WAT02 Water Monitoring and WAT03 Water Leak Detection.
- 10.6.4. The installation of smart meters would be progressed in partnership with Cambridge Water. British Land would support the development of the associated wireless infrastructure to ensure regular transmission of signals.
- 10.6.5. While Cambridge Water would own the residential metering data, it would be shared with a Community Water Efficiency Support Officer (see below) to facilitate monitoring across the Illustrative Development Option, to assess and validate performance against design targets.

¹² SCADA (supervisory control and data acquisition) is a category of industrial control systems (ICS) that remotely gathers data in real time from industrial processes in order to supervise and control equipment and conditions. SCADA tools enable organizations to control and monitor their industrial devices and make data-driven decisions regarding their industrial processes.

¹³ <https://www.nwl.co.uk/services/water/water-meters/smart-water-meters/>

10.6.6. While the commercial water metering data would be owned by the selected water retailer¹⁴ the data would be shared with the commercial customers and used to monitor, validate and improve water consumption.

10.7. Behavioural Change Campaign

10.7.1. Behavioural change can drive long-term water efficiency improvements in residential and commercial settings.

10.7.2. A behavioural change campaign would be developed and implemented for the Illustrative Development Option. This would commence during the marketing of the new homes and commercial properties, providing key messages on the importance and value of water management, outlining the innovative technologies and approaches adopted on-site.

10.7.3. A welcome pack would be provided when residents / tenants move into a property. This would contain advice and guidance on water consumption, water efficiency, water reuse and responsibilities regarding ownership and management of water-related assets. The water efficiency pack would be developed in collaboration with Cambridge Water (and the chosen water retailer) and would incorporate best practice.

10.7.4. British Land would work with other stakeholders, including Cambridge Water and the Greater Cambridge Partnership, to discuss joint-funding of a Community Water Efficiency Officer as part of a sustained remit to continue long term water consumption good practice. The role would provide support to communities across Cambridge to facilitate the identification and realisation of water efficiency savings from existing and new residential developments.

10.8. SuDS

10.8.1. The adoption of integrated water management principles has been integral to the design of the Illustrative Development Option.

10.8.2. Climate change will continue to affect the region, and the SuDS strategy incorporates features that would support flood risk management while also retaining water for recycling and reuse.

11. Conclusion

11.1.1. The Illustrative Development Option would be designed, constructed and operated to deliver beyond best practice levels of water efficiency, to reduce demand on the potable supply and reduce impacts to the water environment.

11.1.2. The integrated water management strategy would enhance water security while actively engaging residents and tenants in sustainable water management practices, fostering a sense of shared responsibility. By implementing cutting-edge water management and metering technologies and promoting environmentally conscious behaviours, the Illustrative Development Option would protect the local water environment while building a resilient community. This approach would serve as a model for future sustainability-driven projects, contributing to the long-term well-being of the region.

¹⁴ While Cambridge Water provides the bulk potable supply, a water retailer is a company that sits between Cambridge Water and commercial customers and provides billing and other support services.

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