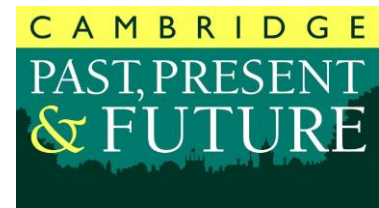


Water Resources East



By email to:

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Cambridge Past, Present & Future

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28/02/2022

Dear WRE

Response to Emerging Water Resources Regional Plan for Eastern England (January 2022)

Cambridge Past, Present & Future (CPPF) is Cambridge's largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel & Barnwell Meadows, Bourn Windmill and Hinxtton Watermill.

CPPF support the efforts of WRE in identifying and understanding the water supply and demand issues facing the region and identifying adaptive and flexible solutions. In response to the consultation we have answered questions 1 and 2.

Question 1: Have we gained a clear initial view of the problem of future water deficits across all sectors and the environment?

CPPF's concerns in relation to water supply and demand relate to the protection and restoration of the environment. We consider that the emerging regional plan recognises the impact of water demand on the environment and we welcome that the environment is central to your planning activity.

Question 2: Are we taking the right approach to identify potential solutions to mitigate the challenge?

An area of concern in the Greater Cambridge area is the health of the chalk streams, rivers and wetland. How the regional plan tackles the levels of abstraction is a key component of protecting these.

CPPF support the view of the Cam Valley Forum that the environmental ambition of the Regional Plan must be to reduce abstraction from the chalk aquifer at source so that chalk springs and headwaters run freely, as they would under natural conditions, every year, whatever the weather. To achieve this, the plan needs to

- take on board the recommendations of the national [Catchment Based \(CaBa\) Chalk Stream Restoration Strategy](#);
- deliver, as far and as fast as possible, the 60-70% reduction in abstraction at source from the Cam Chalk aquifer that is needed to ensure sustainable river flows, as assessed by the Environment Agency; and

- cap all abstraction from the Cam Chalk aquifer in the catchment at today's actual (not licensed) levels so that none of the three water companies takes any more water annually from any borehole than the recent average.

We have some concerns over the emerging regional plans comments regarding abstraction permits. The plan explains that most permits will be subject to periodic review but some permits will avoid review until they expire (page 25). Our response to this position is that periodic reviews of abstraction licences need to be timely if there is evidence that sensitive sites (eg of biodiversity importance) are suffering because of lack of water. Secondly, the uncertainty about existing time limited permits avoiding periodic review is worrying. Of course, this will depend on how long a permit has to go, but if abstraction is causing problems for (e.g.) a site of biodiversity importance, how will this be tackled? This emphasises the critical importance for adequate monitoring of abstraction to ensure that environmental problems don't arise. The plan does acknowledge (page 31) that '*water availability needs to be reviewed regularly based on improvements in understanding on what the system can sustainably support*'.

CPPF consider's that the environmental destination scenario must include ENHANCE to ensure maximum environmental protection. ENHANCE sees greater environmental protection for Protected Areas and Sites of Special Scientific Interest (SSSI) rivers and wetlands, principal salmon and chalk rivers. However, we consider that the definition of ENHANCE needs to be expanded. An ENHANCE scenario needs to include both protection and restoration as key objectives. It should also include locally designated non-statutory sites as well as statutory protected sites.

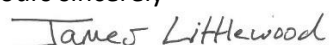
Question 3: Does our emerging adaptive plan, including the immediate low-regret options such as reservoirs, look like it will help address the problem?

The answer to this depends on whose perspective of the problem you take. In relation to the Greater Cambridge area there is a problem because the next Local Plan is proposing a higher level of growth than a sustainable water supply can match. Reservoirs would solve that problem but won't come on stream until 2035, so there is a problem in the interim. In that interim, it will be difficult for the planning system to grant development permission and control the rate of development so that it does not run ahead of sustainable water supply, especially if this is reliant on demand management which is not an exact science. Future development in Greater Cambridge is focussed on a small number of very large development sites which are being built at scale with significant supporting infrastructure and therefore it may not be practical or financially viable to halt or slow development due to insufficient water. This is as much a problem for the Greater Cambridge Planning Service and for the construction industry as it is for the water industry.

WRE is congratulated on the number of member organisations and the breadth of knowledge and experience which they bring to the process. CPPF work closely with Natural Cambridgeshire and Cam Valley Forum. We support the message that the water issue cannot be solved by one group of water users alone and it needs to be a collaborative approach. It is unclear at the moment what the mechanism is to achieve this and how the work of the organisations will be monitored and reviewed against the regional plan.

I trust that you will take our comments into consideration.

Yours sincerely



James Littlewood
Chief Executive