Dear Stephen,

Thank you for the response to my level 1 complaint. I was disappointed that my questions in the stage 2 complaint were not answered, and I have been advised by solicitors to send these questions back to you directly.

Your response to my email dated 26th February, appeared to contain inaccuracies and fail to acknowledge other realities.

I have numbered these below, and I highlight questions in red. Also, since receiving your reply, on the 1st July, the Secretary of State for the Environment has declared Cambridge Water an area of serious water stress. This has new implications for Cambridge Water abstraction. I have added new questions relating to this in section 6.

1. Qualification of the Stantec Report

2. The Amount of Growth that can be Accommodated

3. New Infrastructure Projects - putting the cart before the horse.

4. Northstowe and Waterbeach

5. The Problem withOptional Water Efficiency

6. Implications of CW being an area of serious water stress

7. Summary

1. Qualification of the Stantec Report

With reference to the Stantec Report, you write

'The study concludes that there is no environmental capacity to increase groundwater abstraction from the chalk aquifer to supply additional growth above that already being planned for being tested in the new Local Plan'

I cannot find the qualification 'above that already being planned for being tested in the new Local Plan' anywhere in the report. The study actually states,

'There is no environmental capacity for additional development in the new Local Plan to be supplied with water by increased abstraction from the Chalk Aquifer.' (full stop, end) Stantec November 2020, section 3.3, 'Headline Findings of Baseline Conditions', bullet point 2 pg 17, attached

Question 1.1

Please could you identify the document, page and section that says 'above that already being planned for being tested in the new Local Plan'?

In fact, Stantec goes further,

'Even the current level of abstraction is widely believed to be unsustainable.."

And the Environment Agency, in their letter to me dated 7th August 2020 (attached), state,

'The Environment Agency determines that current levels of abstraction are causing environmental damage.'

Question 1.2

Do you and other planners (Sharon Brown, Mike Huntingdon, Chris Carter, and any other planning officers) agree that the statements quoted here from the Stantec Report and the Environment Agency mean that we already unsustainable in water? If not, can you explain how else these statements can be interpreted?

Question 1.3

How is this existing pressure, for which significant remedial work is needed, being addressed?

2. The Amount of Growth that can be Accommodated

Your response claims existing Local Plan commitments (including current allocations for Northstowe and Waterbeach) can be accommodated, but I can find nothing in the Stantec Report that indicates this. It simply states that Cambridge Water have *'between 2 and 4 Ml/d available in the current Water Resource Management Plan..'* (Stantec Report, Nov 2020, Section 3.3 'Constraints to Development' pg 19) Though even this is unlikely now that the Secretary of State has determined Cambridge Water as an area of serious water stress (see section 6). Estimated water consumption for Waterbeach New Town based on an extremely optimistic 110 litres per person per day is 2.9 Ml/d, and for Northstowe, 2.6Ml/d. Both exceed the lower availability in the current WRMP alone, let alone combined.

Question 2.1

Please could you provide the quote/ evidence which says existing Local Plans can be accommodated? Can you share the calculations which confirm these assertions?

You go on to write about *'additional new sites'*, which will need to be balanced through a range of measures such as leakage reduction, and new infrastructure projects, and on *'proposed options to maximise supply and increase demand management...'*

As stated in the original complaint, we know demand management has consistently failed,

'Defra has left it to water companies to promote the need to reduce household water consumption, and yet it continues to increase.'

https://www.nao.org.uk/report/water-supply-and-demand-management/

Andy Willicot, MD of Cambridge Water, recently admitted that:

'During the past 12 months, demand for water from our customers has increased by around 5% – largely as a result of the COVID-19 pandemic and sustained periods of dry weather during the year.' (see attached)

There is a complete failure on your behalf to acknowledge this reality.

Question 2.2

Do you accept that previous efforts to reduce consumption through demand management and leakage reduction have failed? Do you, or do you not factor this in when making planning decisions?

The Stantec Report states,

'..the supply-demand balance will be reviewed for the next WRMP (to be published in 2023), and the available headroom may be reduced, particularly where significant non-household or commercial development is proposed and gains planning approval. The Environment Agency would like to see existing headroom prioritised for environmental betterment.' (Stantec Report, Nov 2020, Section 3.3 'Constraints to Development' pg19)

Question 2.3

How will giving planning approval for any development impact on the Environment Agency's desire to see existing headroom prioritised for environmental benefit?

3. New Infrastructure Projects

In your letter, you state

'additional new sites will need to be balanced through a range of measures, including greater water efficiency in new developments (for example the type of measure that have been applied at Eddington), continuing reduction in leakage and shifting to more sustainable water sources. These additional water resources are likely to require major new regional water supply reservoirs and transfer schemes already being planned and coordinated by Water Resources East and anticipated to be operational from the mid-2030s'

Question 3.1

What are the water efficiency measures in place at Eddington? How is water usage at the site being monitored to see if they are actually working?

With regards to new reservoirs and transfer schemes, the Environment Agency wrote this on the 7th August last year,

'We recommend that councils consider the long term viability of supplying new developments and how the phasing of growth links to the timings of the planned new strategic schemes.'

I think a fair translation is that you should ensure that you don't give the current horse more carts to pull or you'll break the horse. You need a new horse to put before your new cart.

Question 3.2 'the horse'

Please could you provide evidence of funding for new reservoirs or pipelines and the timetable that is in place for them to be fully operational?

Question 3.3 'the cart'

Can you ensure that these 'additional developments' that might otherwise be dependent on increased abstraction, (which I assume are all of them bar Northstowe and Waterbeach which are dealt with separately, if allegedly inaccurately) are not given approval until the new water infrastructure in question 3.2 is fully operational?

Question 3.4

Please could you confirm that the proposed reservoir at Bourn, mentioned by Andy Willicot, and any other reservoirs, will not simply be filled by increased abstraction from the Chalk Aquifer or other equally over- abstracted sources? Where will the water for Bourn specifically, and other reservoirs come from?

Secondly, transfer schemes are very energy intensive to transfer water resources.

Question 3.5

If you are considering the options of trading water from other regions what are the calculations for carbon capture?

Finally in this section, there are significant governance issues involved in making long distance transfers and/or making the link with flood drainage and the infrastructure for storing it.

Question 3.6

What is the plan to resolve these governance issues?

4. Northstowe and Waterbeach

In reference to Northstowe and Waterbeach, you write,

‘These plans (2003, 2007, 2018) were found sound through independent examinations and included consultation with statutory consultees like the Environment Agency. The plans form the basis for the consideration of applications.’

This is undoubtedly the case, but the glaring oversight is that there is no comment on water supply in the EA reports or water company reports. When I questioned water supply with the Environment Agency, their response on 7th August 2020 (attached) reveals a very different reality, and specifically in reference to NORTHSTOWE PHASE 3A – 20/02171.

'The Environment Agency determines that current levels of abstraction are causing environmental damage. Any increase in use within existing licensed volumes will increase the pressure on a system that is already failing environmental targets.'

Your response completely fails to acknowledge this new information.

Question 4.1

Would you agree that this more recent assessment should override earlier reports? If not, what are the material planning considerations that outweigh this environmental constraint?

Further, the Environment Agency write,

'We recommend any proposed development considers water resources as a key issue and the council recognises the damage of long term increases in abstraction due to growth.'

Question 4.2

Do planners working in Cambridge, South Cambs and Greater Cambs recognise the damage of long term increases in abstraction due to growth?

Has a cost benefit analysis of growth vs loss of ecology, agriculture, desertification been carried out? Can you share it? The loss of Ecology is not something in the distant future. It is already underway. The Environment Agency found at the time of writing last August 2020 that,

'The Anglian River Basin Management Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718327/Anglian_RBD_Part_1_river_basin_management_plan.pdf) considered the status of all rivers and aquifers in the Region. This showed many waterbodies did not have the flow required to support the ecology and groundwater units not meeting good status.'

Question 4.3

Can you acknowledge that you have read this and accept that 'many waterbodies did not have the flow required to support the ecology'? What do you understand this to mean?

5. Optional Water Efficiency

According to your response,

‘The adopted Local Plan includes Policy CC/4 Water Efficiency, which implements the optional technical standard for water efficiency that can currently be applied where there is a clear local need.'

Question 5.1

Which water efficiency measures, such as grey water recycling, rainwater harvesting and water saving showers and taps etc, have been installed in the most recent developments such as Marleigh, the Ironworks in Mill Rd, the Timber Works, various developments in Trumpington, and any other major developments in Cambridge and South Cambs, other than Eddington?

Question 5.2

If these very new developments do not have some or any of these water saving measures, can you explain why this failure has occurred?

6. The Implications of Cambridge Water being designated an Area of Serious Water Stress

Question 6

In view of Cambridge Water being designated as an area of serious water stress by the Secretary of State, and data from the Environment Agency that shows Cambridge Water need to reduce abstraction by 22 million litres per day from current levels, perhaps you can clarify how Cambridge Water's current WRMP accounts for this to your satisfaction?

7. Summary

Based on the most recent evidence, current levels of abstraction and discharges from the existing built development in Cambridge and South Cambs are already unsustainable and impacting on our ecology. There has clearly already been a failure to find solutions in time, whether due to inadequate WRMPs from Water Companies, regulatory failure from the Environment Agency, weakness from planning officers and elected councillors to resist the growth lobby and big money, or government deliberately forcing unsustainable growth on Cambridge and South Cambs at the cost of ecocide. Some chalk streams, such as Coldhams Brook, are near enough biologically dead. Any additional growth will clearly make an already bad situation far worse. It will also be in breach of the National Planning Policy Framework, and specifically for water within Water Framework Directive, which states that

‘Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.’

Please could you demonstrate that sustainability is achievable and genuinely deliverable and that present impacts can be removed, by providing the information requested in the questions above?

If this is not possible can you explain why further development is justified on the Cam Chalk Aquifer despite the environmental harm?

Kind regards,

Monica Bijok Hone

Environmental Campaigner

Member, Friends of the Cam Steering Group