Policy CC/FM doesn't take adequate account of the local heavy clay soil.

A better drainage recommendation is needed for low infiltration areas, together with stronger planning review and enforcement. A register of areas with flooding issues should also be maintained, and systematically be consulted in any planning applications. This should include areas with reported local drainage issues, as many villages have flooding problems caused by drainage systems that have been compromised by previous developments, which are not reflected on the Environment Agency risk map.

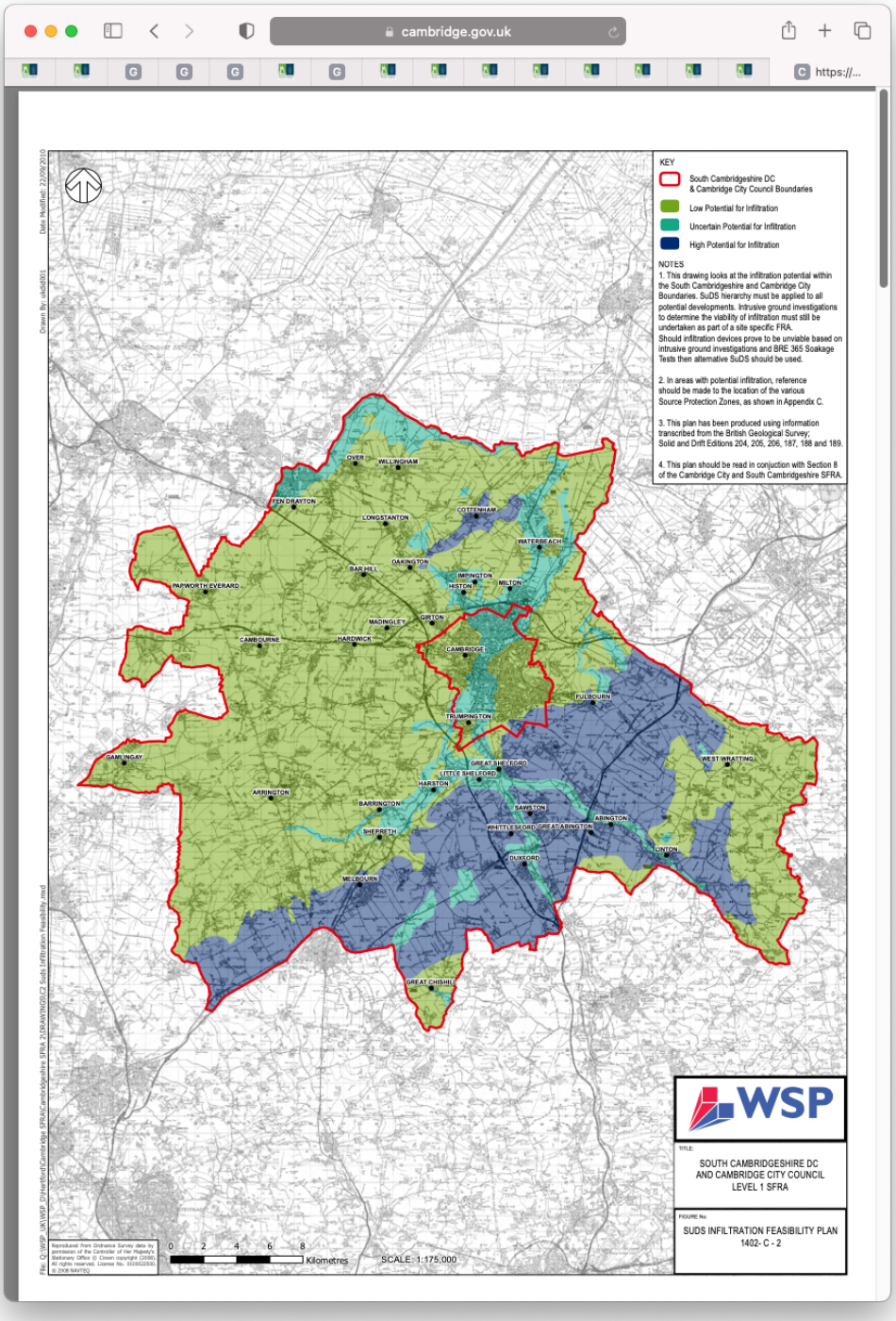
If the recommendation includes surface features such as swales, lower housing density may be required to allow sufficient space. This should be explicitly recognised, and this space should be distinct from areas set aside as Public Open Space.

Explanation:
The policy states that
"Developments will be required to provide integrated water management, including sustainable drainage systems (SuDS), where surface water is managed close to its source and on the surface where reasonably practicable to do so."
and refers to the Strategic Flood Risk Assessment
https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/StrategicFloodRiskAssessment_GCLP_210831.pdf.

The SFRA gives a prioritised SuDS methodology:

1. Soakaway, infiltration system
2. Watercourse
3. Surface sewer or highway drain
4. Combined sewer

Unfortunately, a significant portion (more than 60%) of the land covered by this Local Plan is unsuitable for infiltration systems (see all the areas in GREEN on the map below from
https://www.cambridge.gov.uk/media/2573/strategic-flood-risk-assessment-appendix-c-part-2.pdf)



Watercourses will not often be available. This means that over a large part of Greater Cambridge, the only available drainage system will be the already overstretched sewerage system. This is not good enough.

There is a large overlap between the area where SuDS systems will be impractical and the sites submitted for development, especially to the west of Cambridge. Increasing housing density and increased extreme rainfall makes this more critical.