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Environment Agency

Greater Cambridge Local Plan Team
GC Shared Planning Service
Cambridge City Council
Cambridge
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Via email:
localplan@greatercambridgeplanning.org

Dear Charlotte & team

Greater Cambridge Local Plan – First Proposals Consultation

Thank you for notifying us of the consultation on the Local Plan First Proposals (preferred options). We have taken the time to review the draft policy directions and associated evidence base.

The Environment Agency has a responsibility for protecting and improving the environment as well as contributing to sustainable development. As an environmental advisor we provide technical information based on the best available evidence and are a specific consultation body for Local Plans.

Our comments are set out below. We look forward to working with you as you progress the plan.

Yours sincerely

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Compendium of Environment Agency Comments

Vision and aims

The vision on page 20 is positive bringing to the forefront decreasing climate impacts, minimising carbon emissions, increasing nature, wildlife and green spaces. Reflecting on the paragraph on page 18, you outline the aim for the Local Plan is simple: to ensure sustainable development. This means planning for homes, jobs and supporting infrastructure in the right places, alongside protecting and enhancing the environment. We recommend the vision reflects this objective of 'sustainable development.' For example, we suggest the following revision as follows:
New development must be sustainable: minimise carbon emissions and reliance on the private car; create thriving neighbourhoods with the variety of jobs and homes we need; increase nature, wildlife and green spaces; and safeguard our unique heritage and landscapes.
This will align closely to the aims of the NPPF (paragraphs 7 and 8) and also demonstrate the importance of this for Greater Cambridge given the unique challenges and opportunities the area faces.

We support the references within the aims to highest achievable standard for water use and resilient to current and future climate risks. The biodiversity and green spaces aim is also positive in its focus on improving the network of habitats and ensuring development leaves the natural environment better than it was before. All these aims will help GC achieve the stated vision and it's important that the interrelationship and interdependencies between these aims are recognised. Recognising the interdependencies will strengthen and ultimately achieve better outcomes for GC. One example is the ecological health and water quality of rivers and water dependant habitats (e.g. wetlands) is also dependent on the availability of water in addition to the contribution developments will make in creating and enhancing habitats and green space. Healthier rivers and water dependant habitats will in turn restore nature, improve the health and wellbeing of communities and have economic benefits. Serving the environment in tandem with growing communities is mutually beneficial and secures long-term resilience. This also reflects the paragraph 153 of the NPPF: 'plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes' etc.

S/DS Development Strategy

We welcome the section on 'Ensuring a deliverable plan – water supply' on pages 41 and 42, which recognises this as a significant issue for the Local Plan. We remain genuinely concerned about whether the growth proposed (48,800 new homes inclusive of 10% buffer and 37,200 from previous plans) can be sustainable without causing further deterioration to the water environment. We understand the regional and water company water resource planning is still ongoing and the next version of the IWMS Detailed WCS will be updated as these plans come to fruition. We offer our support to work collaboratively with all the parties involved.

Current levels of abstraction (not just in Cambridge) are causing environmental effects. Increase in usage within existing licenced volumes will increase the pressure on a system that is already failing some environmental targets. The Anglian River Basin Management Plan shows many waterbodies do not have the flow required to support the ecology. Abstraction licencing reductions are likely to reduce the supplies available to water companies in our efforts to prevent deterioration of the water environment. As the plan and evidence base progresses it will need to be clearly demonstrated that the water companies plans can meet the needs of growth without causing deterioration.

As a best case scenario the strategic water infrastructure (new Fenland reservoir) would be available from the mid-2030s and its foreseeable this could be later i.e. the 2040s. It is the short to medium term period coinciding with the majority of the plan period for which rapid and viable interim solutions are needed. There is currently uncertainty about whether water supplies can be provided (both supply and

demand management) in a way that is both sustainable and sufficient for the proposed growth over the plan period.

We support the idea of development limited to levels that can be supported by a sustainable water supply (phased delivery) until the time the strategic infrastructure is in place, though we are mindful this may lead to heavily back loaded delivery. If the Council approaches neighbouring local planning authorities as you already recognise it is likely they will have similar issues, though some may have more options for interim solutions. This highlights the importance of cooperating across planning boundaries and growth plans being considered in the context of the combined pressure on water supplies at a regional scale.
As previously mentioned, 2050 may be a more appropriate end date for the plan period given the challenges being faced which in reality require a longer lead in time to support development, e.g. strategic water resources infrastructure, climate change resilience, etc. This would also align with paragraph 153 of the NPPF 'plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes' etc.

Integrated Water Management Study – Outline Water Cycle Strategy

The WCS will rely on further evidence coming forward from both regional and water company water resource plans. The WCS will need to demonstrate that feasible and deliverable mitigation measures are available for the interim period until new strategic water resources options will come online.

As noted, the WCS will need to base its assessment on the forthcoming water resource plans (WRMP24) rather than the existing, as this will have a more accurate picture of the water resources situation taking into account abstraction licence reductions. Both Cambridge Water and Anglian Water are likely to require further sustainability reductions in PR24. This could mean some or all of the current water surplus's (available headroom) are no longer available for transfer.

The reliance on demand management options is currently high-level. These will require assessment of feasibility, effectiveness and how implementation will be monitored and measured corrected if they are not working.

In facing what is collectively a significant challenge we offer our support to work collaboratively with the interested parties ahead (and beyond) the next consultation in 2022.

S/NEC: North East Cambridge

We note the intention of the policy is to set out the place-making vision and a robust planning framework for the comprehensive development of this site. There are both environmental risks and opportunities to developing this site sustainably. Ensuring sustainable water supplies, improving water quality and the effective remediation of land contamination will be key considerations in achieving this. The proposed policy direction anticipates the site (once developed in full, which will extend beyond the Local Plan period of 2041) will deliver 8,350 new homes. The IWMS Detailed WCS will need to provide evidence the new homes (and employment) can be sustainably supplied with water in time for the development phases.

The existing site at Fen Road, Chesterton continues to be a source of ongoing local water quality and environmental health problems due to inadequate foul drainage provision. There have been a number of reports of foul sewage from the site discharging into the River Cam, causing chronic on-going pollution. The relocation of the existing Milton sewage works and extensive redevelopment of North East Cambridge presents the opportunity to incorporate mains drainage connection into the Fen Road site.

Policy S/NS: Existing new settlements

With regard to the existing allocations NS/3 and SS/5 Northstowe, we are investigating flood risk management options to reduce the risk of flooding in Oakington. This will take account of measures looking to attenuate water upstream (on the upper reaches of Oakington Brook and as part of the Northstowe development), potential channel modifications and natural flood management. We note that early phases of Northstowe are under construction. We recommend the emerging policies include this as

an opportunity both in terms of delivering flood risk management measures or securing financial contributions towards this project.

CC/WE: Water efficiency in new developments

We support stringent water efficiency in water stressed areas. We recommend reviewing the document The State of the Environment: Water Resources (2018) prepared by the Environment Agency. This document outlines the challenges we now face summarised as follows. Water supply (resource) is under increasing pressure from population growth, land use change, and climate change (including hotter weather increasing evaporation, less rainfall in summer, and intense rainfall events not recharging aquifers efficiently). Without increasing our supply, reducing demand, and cutting down on wastage many areas will face significant deficits by 2050, if not sooner. If not addressed this represents an immediate and measurable blocker to future growth. We need to consider development in the context of available water resources, balancing economic growth with protecting and enhancing the water environment. We will need to ensure that there is enough water for both people and the environment, that water is used efficiently, that water is protected as a precious resource, and that wastewater is treated efficiently to cut associated carbon emissions.

We agree the evidence of the water resources situation in Greater Cambridge justifies the tighter standard of 80 litres/person/day for housing. The risk of this standard not being met is an increase in abstraction risking deterioration of associated water bodies. As page 150 recognises (with reference to the Deregulation Act 2015) GC Council will need to be satisfied that this standard can be legally and practically implemented in the context of current legislation (Water Industry and Development Industry), national policy and building regulations. This affects the practical implementation of this policy. It would need to be determined the evidence/metric applicants would be expected to submit to demonstrate this standard has been achieved. It would also need to be evidenced how the policy standards would be implemented, and how this would be monitored to ensure the policy is effective.

A positive standard is proposed for non-residential development, which we support. Water neutrality should also be explored, noting the references made to water reuse and offsetting.

The Integrated Water Management Study (IWMS) states that 80 litres/person/day is achievable by making full use of water efficient fixtures and fittings, and also water re-use measures on site including surface water and rainwater harvesting, and grey water recycling. It comments that the cost effectiveness improves with the scale of the project, and that a site-wide system is preferable to smaller installations.

Currently the policy direction has a caveat of ‘unless demonstrated impracticable.’ This should be explored further in the WCS so the Council has clear guidance on the circumstances where achieving this standard would be impracticable. This will help ensure planning applications can be fairly and reasonably assessed. This will also help ensure the overall goal of the policy is not weakened or undermined. Similarly this evidence needs to be drawn out for the non-residential standard. The WCS should also set out the backstop position should the standard of 80 litres/person/day be practicably unachievable.

Although we support water efficiency measures in new development, we consider that the plan is currently unlikely to achieve the kinds of reductions in demand needed to keep the proposed levels of growth within sustainable levels. As noted with policy S/DS, the evidence base (IWMS Detailed WCS) will need to demonstrate how the water companies’ plans can meet the needs of growth without causing unsustainable abstraction and associated deterioration. We offer our support to work on this collaboratively with the interested parties both ahead of the next consultation in 2022 and beyond.

Page 150 references the Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc. We recommend this is also considered and referenced elsewhere in the plan with regards to net zero, net gain, tree cover and strategic resource infrastructure provision.

CC/DC: Designing for a changing climate

The proposed policy intends to set out how the design of developments should take account of our changing climate, for example, extreme weather events including flash flooding. We welcome the reference (p. 152/153) to site wide approaches to reduce climate risks, including sustainable drainage systems as part of landscape design, urban greening, increased tree canopy cover and integrating green spaces into new developments. In the context of flooding and climate change it would also be appropriate to reference flood resistance and resilience measures (see PPG: https://www.gov.uk/guidance/flood-risk-and-coastal-change#Flood-resilience-and-flood-resistance). Site wide approaches should also include adaptive measures such as setting a development away from a river so it is easier to improve flood defences in the future. In addition, making space for water to flood and be stored will be critical to long term adaptation. Planning to avoid future flood risk is as much about creating storage or contributing to nature based flood risk reduction measures (e.g. creating wetland habitats) as it is avoiding flooding to new properties.

In shaping this policy, we recommend GC Council also consider the ADEPT local authority guidance on preparing for a changing climate (2019) and the new TCPA The Climate Crisis, A Guide for Local Authorities on Planning for Climate Change (October 2021).

The Fens Baseline Report (available at https://www.ada.org.uk/knowledge/future-fens/) indicates that rising sea levels to 2115 will mean water will not drain by gravity to the sea, requiring the pumping of vast quantities of water. The carbon and engineering implications of this are significant but not yet calculated. There is a compelling case for surface water to infiltrate into permeable ground ensuring that water resources are not depleted of water. In areas of less permeable geology, net gains in surface water attenuation and re-use of the water as 'green water' in homes, businesses or agriculture has been considered through this study.

CC/FM: Flooding and integrated water management

We welcome the inclusion of Policy CC/FM. We agree a policy that responds to the local water management issues is needed. As climate change will intensify the existing pressures on water availability, water quality, drainage and flood risk an integrated approach to water management will be essential. As stated this should include a robust approach to drainage and water management. The proposed policy direction is a good starting point but given the water challenges (our comments to Policy S/DS) it should strive to secure both mitigation and betterment through growth.

The local policy approach should be informed by the IWMS Water Cycle Studies, the Level 1 SFRA and other relevant strategies. We would expect to see the policy content evolve with the following considerations:

1) Though the policy direction indicates that policies will require that the risk of flooding is not increased elsewhere, it should seek to secure betterment and reduce flood risk overall, wherever possible, as part of GC's strategy to adapt to climate change. This aligns with our previous comment that making space for water to flood and be stored will be critical to long-term adaptation. Floodplain storage, natural flood management and surface water attenuation are all measures that will contribute. Protection of potential flood storage land (including functional floodplain/Flood Zone 3b) and financial contributions towards flood risk schemes could also benefit communities at risk of flooding are also much needed options. Although many sites are located in Flood Zone 1 (low probability of flooding from rivers) there are also many sites located on the fringes of Flood Zones 2 and 3 meaning these are at risk of reducing (potentially eliminating) future flood storage options for adapting to climate change. In the background, urban creep and small infill developments which do not attenuate for surface water impact drainage systems and watercourses downstream. In planning to manage future flood risk in GC, creating extra storage to allow space for flood waters is a vital element of that plan.

2) We expect the policy to include provision for water supply and waste water infrastructure, ensuring water quality and treating and re-using waste water. We recommend that the provisions of Policy CC/7, 'Water Quality', of the South Cambridgeshire Local Plan 2018 are considered and brought forward into the Greater Cambridge Local Plan. Site policies may also need to include specific infrastructure requirements. These should become apparent, and be informed by, assessments carried out in the IWMS Detailed Water Cycle Study.
3) There needs to be a policy approach that recognises a clear integration encompassing water resources, water quality, flood risk and recognising the role of green infrastructure. Although the value of green infrastructure and river corridors is recognised in policy BG/GI and BG/RC, it is worthwhile including it as part of the integrated water management policy. The Greater Cambridge Green Infrastructure Opportunity Mapping Study touches upon this relationship under the Water Storage bullet as follows:

Our rivers are a source of flood risk. Restoration of natural flood plains where practicable and provision of green infrastructure can help reduce flood risk along the rivers itself and beyond. Wet woodland will self-set and grow where conditions are right and management allows. Providing the right conditions for trees to grow in appropriate locations in river corridors can support flood risk mitigation and biodiversity.

Integrated Water Management Study – Outline Water Cycle Strategy (WCS)

For water quality we welcome that the Outline WCS has been amended based on our previous feedback. However a number of issues raised remain unresolved which we can expand upon in a more detailed response to the Council's consultants. Some of the information presented does not represent the proper 'baseline' for subsequent assessments and the extent of the challenge of delivering the quantum of growth proposed in the Local Plan. For example, 2019 WFD classification data is presented but waterbody objectives are from 2015, also the information in chapter 6 does not take account of river quality improvements delivered by AMP6 or AMP7 schemes. The identified assessment methods need to be sufficiently robust, and potential mitigation actions will need to be shown to be viable. The Detailed WCS will need to provide evidence to demonstrate the delivery of foul drainage provision can be provided whilst protecting water quality of rivers.

Climate change topic paper
(IWMS Level 1 Strategic Flood Risk Assessment)

We have reviewed the Level 1 SFRA. The majority of sites are in fluvial Flood Zone 1 with a proportion of sites with partial Flood Zone 2 and 3 either within the site boundaries or close to boundaries. Surface water flood risk also affect most of the sites to a limited or greater extent. Flood risk and climate change adaptation is an important consideration of the Local Plan in view of the predicted impacts of climate change on flood risk.

Page 39 of the Climate Change Topic Paper states that the Level 1 SFRA (2021) has been used to support the selection of development sites through the application of the Sequential Test. This statement within the topic paper is helpful, however, it does need to be more obviously demonstrated how the Sequential Test and sequential approach to all forms of flooding has been applied. The Planning Practice Guidance advises a number of options for this including a standalone report, Sustainability Appraisal commentary, etc. This will need to be produced in time for the next draft plan consultation so it is clear how the test has been applied and demonstrated.
Page 42 explains that where necessary a Level 2 SFRA of sites in the draft plan will be carried out to ensure that designs and capacity fully reflect management of flood issues. We think that a Level 2 SFRA is necessary particularly for those sites located on the fringes of Flood Zones 2 and 3, or partially within those zones. In predominantly flat or fenland areas, breaches in flood defences can cause flooding in Flood Zone 1 due to the concentration of floodwater in one part of the floodplain, for example, the Waterbeach New Town allocation. Some sites have unmapped ordinary watercourses running alongside or through them and often these have not been modelled as part of the indicative flood map due to their limited upstream catchment size. As such there is some uncertainty over the level of flood risk to the site, with the potential that fluvial flood risk may be greater than the Flood Map for Planning. These sites will

require further investigation to better refine the flood extents (including climate change) preferably by flood risk modelling or utilising the Flood Map for Surface Water (FMfSW). For some sites, fluvial climate change assessment is required as this is not modelled.

A Level 2 SFRA could also identify suitable land or techniques that could be used for flood storage to adapt to climate change and urban creep. Even if these cannot be brought forward at this stage in the plan, these could be protected for future plans or for infrastructure to bring forward at the appropriate time. The LLFA may also have areas of surface water flooding to be further investigated. The Level 2 will help determine whether the site can be developed safely, mitigation measures required, sequential approach and applying the Exceptions Test (NPPF paragraph 164). The Level 2 SFRA should inform the site specific polices within the plan that will form the planning framework for the sites. We can provide a separate list of the sites we think would require L2 SFRA assessment if helpful.

BG/BG: Biodiversity and geodiversity

This policy will control biodiversity impacts from development and set out Biodiversity Net Gain requirements (aiming for 20% BNG). We welcome and support the Council's policy direction on this. It should be clear that BNG is in addition to the standard requirements of the mitigation hierarchy i.e. avoid harm where possible, mitigate for the effects or compensate (paragraph 180 of NPPF).
We recommend that local authorities adopt a natural capital evidence approach to underpin their local plan. This is mentioned briefly in the evidence base within the green spaces topic paper. Information can be found here. Natural Cambridgeshire have done some work in this area, looking at opportunity mapping. Also, the recent Oxfordshire Plan 2050 (Reg 18) had some good natural capital and ecosystem services wording (policy option 09) that we recommend you consider. Preparation of a natural capital evidence base and policy is something we (and likely Natural England) could advise on in advance of the next consultation stage.

Wider environmental net gains is also identified as a potential policy requirement which we support, and pending further guidance from a national level. We recommend that geodiversity is also considered.

We recommend ambitious maintenance requirements to protect and ensure longevity of net gain enhancements. The Environment Bill mandates 30 years but 'in perpetuity' should be aimed for where possible.

The proposed policy direction includes that off-site measures must be consistent with the strategic aims of the Greater Cambridge green infrastructure network strategic initiatives. We welcome the GI initiatives so far identified within the GC Green Infrastructure Mapping which include revitalising the chalk stream network, the River Cam corridor and enhancement of the fens.

This work can also help to inform a future Local Nature Recovery Strategy in identifying valuable sites, sustainable land management and how the loss and/or fragmentation of existing habitats should be avoided as much as possible. The creation of bigger, better and joined-up habitats will be beneficial to wildlife, contributing towards the local plan's objective of doubling nature. The creation of large networks will also support ecological resilience to predicted future impacts from climate change and are likely to overlap with net gains in flood risk management.

We recommend this policy also acknowledge the significance of invasive non-native species (INNS) and their impacts on wildlife and the environment. INNS are considered one of the top five threats to the natural environment. They can impact on wildlife, flood risk, water quality and recreation. Costs to the economy are estimated at £1.8 billion per year. Prevention through adopting biosecurity measures can help to reduce the spread and impacts of INNS.

BG/GI: Green infrastructure

We support the policy direction which will require all development to include green infrastructure, and protect/enhance water environments. We welcome the list of green infrastructure initiatives on page

173/174 which includes revitalising the chalk stream network and references the River Cam. It's positive that developments will be expected to help deliver or contribute towards these to enhance the existing green infrastructure network.

In addition, we consider 'connectivity' as a key component of this policy. As noted in the Sustainability Appraisal (Non-Technical Summary p. 15) fragmentation and erosion of habitats can be detrimental to wildlife. Existing and new habitats and greenspaces should be retained and enhanced, in connection with existing habitats and the wider countryside, establishing a coherent ecological network, as per the NPPF. We support the references to 'providing links' and connecting to the wider ecological network as part of this policy, as this will be invaluable to both green infrastructure provision and nature recovery.

Existing areas of habitat and green spaces within proposed development footprints should be protected and incorporated within landscape designs where possible. As well as protecting existing areas of habitat, mitigation and environmental enhancements can be delivered through appropriate design that includes creation of new habitats and green spaces. New habitats should be representative of and complement the local landscape character, whilst being linked to existing features and the wider countryside, creating joined-up, resilient ecological networks

BG/RC: River corridors

We support the inclusion of a policy to manage development that has an impact on river corridors and proposes to protect, enhance and restore natural features, supporting re-naturalisation. This is particularly important for Cambridge due to the presence of chalk streams and the role rivers and their associated floodplains play in managing flood risk and provision of habitats. The proposed policy direction includes 'ensure that the location, scale and design of development, protects and enhances the character' and we recommend this includes the provision of appropriate setback of developments from rivers to provide sufficient space for flood waters as well as safeguarding the integrity of the river banks and the development itself. Rivers unless they have been artificially straightened move through their landscapes through natural processes of erosion and deposition. Although river migration occurs over long time periods, developments should be set back generously to account for this alongside climate change. Natural flood management also has the potential to deliver multiple benefits. Tall buildings can have an adverse effect if located too close to a watercourse by introducing overshadowing impacts and artificial lighting which disrupts natural diurnal rhythms of wildlife such as bats.

Wellbeing and inclusion – general comments

We recommend reviewing the document The State of the Environment: Health, People and the Environment (2020).This report, prepared by the Environment Agency, highlights the substantial body of evidence indicating the physical and mental health benefits of spending time in the natural environment. Access to the natural environment is not equally distributed, those living in deprived areas often have poorer quality environments with less accessible green and blue space. The GC Local Plan presents an opportunity to level-up communities, tackling this green inequality at scale and improving the health and wellbeing of those living and working in the GC area, by creating and contributing to healthier, greener, and more accessible environments. This must, however, be achieved in balance with the need to protect the environment, by providing appropriate wildlife refuges from human disruption and interference.

WS/HS: Pollution, health and safety

We would welcome a policy that details how land contamination should be considered, ensuring the land is suitable for the end use but also ensuring that water quality of the underlying aquifers is protected.

There are some plans and strategies that will be relevant to inform this policy. In 2018 the Government committed through the 25 Year Environment Plan to 'achieve clean air' and to 'minimise waste, reuse materials as much as we can and manage materials at the end of their life to minimise the impact on the environment'. The State of the Environment: Health, People and the Environment (2020) highlights the extent of the threat that air quality poses to health in the UK, shortening tens of thousands of lives each year. Analysis also shows that areas of higher deprivation and those with high proportions of ethnic

minorities are disproportionately affected by high levels of air pollution. Growth plans provide the opportunity to address these inequalities by improving the quality of the environment and strategically planning the location of land use types.

We welcome that the policy will provide protection to and from hazardous installations. However, Waste management facilities also have the potential to pollute the environment, cause nuisance or amenity issues through dust and particulate emissions to air, release to ground and surface water, and to leave a legacy of contaminated land. Studies have found that more deprived populations are more likely to be living closer to waste sites, and can therefore at times be subject to greater impacts such as noise, litter, dust, odours, or increased vehicular traffic. Strategic planning of waste and resource use provides the opportunity to address this issue.

H/RC: Residential caravans

This policy will set out the criteria to be used when considering proposals for new residential caravan sites. Annex C 'Flood risk vulnerability classification' of the National Planning Policy Framework (NPPF) classifies caravans, mobile homes and park homes intended for permanent residential use as highly vulnerable. Permanent caravans, mobile homes and park homes if located adjacent to rivers are at significant risk from being inundated very quickly from floodwaters, without sufficient warning or adequate means of escape. There are additional dangers from the potential for floating caravans (if they become untethered), cars and objects/debris becoming trapped beneath the caravans will increase the risk by displacing floodwater elsewhere.

Page 295 states that an accommodation needs assessment is currently being developed. The Sequential Test (paragraph 161 of the NPPF) should also be applied to the accommodation needs assessment to avoid where possible locating accommodation sites in areas at risk of flooding. This should be informed by the Level 1 and where necessary a Level 2 SFRA. We recommend given the high vulnerability of this type of accommodation that flood risk is a key consideration within the policy criteria.

H/GT: Gypsy and Traveller and Travelling Show People sites

The proposed policy direction includes 'Sites are capable of providing an appropriate environment for residents in terms of health, safety and living conditions.' Similar to our comments to Policy H/GT above, Annex C 'Flood risk vulnerability classification' of the NPPF classifies 'caravans, mobile homes and park homes intended for permanent residential use' as highly vulnerable. Sites used for holiday or short let caravans and camping (subject to a specific warning and evacuation plan) are classified as more vulnerable. We recommend given the higher vulnerability of this type of accommodation that flood risk is a key consideration within the policy criteria.

Page 298 states that a joint accommodation needs assessment is currently being developed. The Sequential Test (paragraph 161 of the NPPF) should also be applied to the accommodation needs assessment to avoid where possible locating accommodation sites in areas at risk of flooding. This should be informed by the Level 1 and where necessary a Level 2 SFRA.

The existing site at Fen Road continues to be a source of ongoing local water quality and environmental health problems due to inadequate foul drainage provision. There have been a number of reports of foul sewage from the site discharging into the River Cam, causing chronic on-going pollution.
Water quality and ensuring appropriate drainage infrastructure is also an important consideration for these sites, both in terms of protecting the environment and safeguarding the health of the site occupiers. Policy H/23 'Design of Gypsy and Traveller Sites and Travelling Showpeople Sites' in the South Cambridgeshire Local Plan 2018 provides an example of this, with the following wording:
d. All necessary utilities can be provided on the site including mains water, electricity supply, drainage, sanitation and provision for the screened storage and collection of refuse, including recyclable materials;"
Policy H/GT should include provision for mains foul drainage and protection of water quality as part of the policy criteria.

Infrastructure – general comments

Infrastructure and connectivity improvements, must be achieved in balance with the need to protect natural spaces, providing both accessibility and retaining restricted access refuges for wildlife. There is the opportunity to achieve both if, for example, cycle and pedestrian networks are considered strategically and systematically alongside green infrastructure and natural capital networks. A holistic approach to connectivity and infrastructure should be adopted, considering the multifunctional possibilities that provision of new transport and utilities infrastructure provide. For example, by integrating new road or rail schemes with flood resilience measures, energy generation, and green infrastructure enhancements.

I/SI: Safeguarding important infrastructure

We welcome the intention to work with infrastructure providers to consider whether planned strategic infrastructure or future land should be safeguarded. This should also include land for flood storage and flood risk infrastructure which is likely to include river corridors. Managing flood risk both now and in the future will require the plan taking a pro-active approach taking into account climate change. Your SFRA evidence base can inform this identification for safeguarding. The functional floodplain (Flood Zone 3b) is a zone comprising land where water has to flow or be stored in times of flood, identified in SFRAs and deemed to be the most at risk of flooding from rivers or sea. The SFRA should also gather information on flood risk management projects. The GOSIS (formerly Great Ouse Storage and Conveyance study) will assess how flood risk within the catchment can be managed now and into the future, giving a high-level evaluation of the costs of benefits of providing large storage volumes in the catchment. The GOSIS project will look for areas for flood risk management and draft outputs from this likely to be available towards the end of GC Local Plan process. There is also the Girton Flood Alleviation Scheme (Washpit Brook catchment) and flood risk management options at Oakington Brook (the latter referenced in our comments to Policy

As mentioned for Policy CC/FM, although a sequential approach has been considered there many sites proposed on the fringes of Flood Zones 2 and 3. This reduces and potentially eliminates future flood storage options for adapting to climate change. It's important the L2 SFRA assesses these sites for their deliverability but also a broad perspective is taken to planning for flood risk both now and in the future. Creating extra flood storage to allow space for flood waters will be a vital component of that plan. We'd also expect safeguarding to include what is required for water infrastructure more broadly (water supply and waste) and green infrastructure/biodiversity.

I/ID: Infrastructure and delivery

We support the policy direction to propose to only permit development if there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the new development. The developer certainly has a role in this, beneath a robust and deliverable strategic framework led by the Council and other strategic infrastructure providers (informed by evidence).

As noted for Policy S/DS, we support the idea of development limited to levels that can be supported by a sustainable water supply (phased delivery) until the time the strategic infrastructure is in place. It is important that development is sustainable and the environment is protected throughout the process of infrastructure planning.