

Planning Policy Team
South Cambridgeshire District Council
South Cambridgeshire Hall (6010)
Cambourne
Cambridge
CB23 6EA

Our ref: AC/2024/132329/01-L01
Your ref:
Date: 30 September 2024

Dear Planning Policy Team

THRILOW AND HEATHFIELD NEIGHBOURHOOD PLAN – SUBMISSION PUBLIC CONSULTATION

Thank you for consulting us on the submission plan for the Thriplow and Heathfield neighbourhood plan.

A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.

We note that the Local Plan for South Cambridgeshire is now older than 5 years and the Local Plan Review has yet to be undertaken. For this reason, we consider the Neighbourhood Plan to be higher risk and are keen to see the inclusion of relevant policy wording in the Neighbourhood Plan covering the environmental issues within our remit.

Ecology

We welcome the inclusion of policy THP8 and policy THP9. Protecting and enhancing the parish tributary feeding the Hoffer Brook

Please note, Cambridge Water have plans for river restoration of Hoffer Brook under the next round of the Water Industry National Environment Programme (WINEP) starting from 2025 onwards. Plans and discussions are currently underway with projects to be determined post-2025 – with delivery between 2025 until 2030, possibly 2035.

We would recommend guidance is sought from the Cam sub-catchment partnership – led by BCN Wildlife Trust – to gather further and more detailed information relating to potential projects and further enhancements.

Further enhancements provide by the Cam sub-catchment partnership include potential wetlands around Wastewater Treatment Works, spring restoration work, possible flood storage.

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We would ask that the neighbourhood plan strongly considers and incorporates making space for water and allowing the river and its tributaries to interact / connect with its floodplain. This will allow the river to undertake natural processes, such as the removal of silt from in-channel to the deposition of silt out of channel within the floodplain during high flows. By making space for water and the incorporation of nature-based solutions, this could potentially reduce the future requirement for maintenance, prevent deterioration of the river's health, and aid its resilience to climate change.

We would recommend aligning restoration and protection measures with the CaBA Chalk Stream Restoration strategy – principally, the importance of restoring and enhancing all three aspects of the water environment - water quality, water quantity and habitat. The strategy highlights the importance of action within the headwaters of chalk streams, and this neighbourhood plan could be an excellent opportunity to incorporate them. More information is available here: [Chalk Stream Strategy - CaBA \(catchmentbasedapproach.org\)](http://catchmentbasedapproach.org)

Site Allocation: Policy THP10

The Grainstore site allocation is located above a Principal Aquifer and 6.10.17 notes the possibility of contaminative historic use on the site. We would suggest that the final sentence is amended to remove “2023” – the planning application should be prepared in line with the current policy at the time of submission.

A site investigation and risk assessment will be required for any planning application. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection>

Water Resources

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water

Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at [Abstraction licencing strategies \(CAMS process\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk).

We hope this information is of assistance. If you have any queries, please do not hesitate to contact us.

Yours sincerely

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