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BY EMAIL ONLY

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Dear Ms Coffey

**APPEAL APP/W0530/W/23/3315611
LAND TO THE NORTH OF CAMBRIDGE NORTH STATION, CAMBRIDGE
NOTE TO NATURAL ENGLAND**

Thank you for your letter dated 1 June 2023 seeking an update on Natural England's current position with regard to the matters raised in our responses to the planning consultations for the above proposed development and following submission by various parties of additional information in relation to the planning appeal.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We welcome the Planning Inspectorate's consideration of Natural England's letters dated 28 October 2022 and 24 November 2022, submitted in response to Greater Cambridge Shared Planning consultations on the planning application for the above proposed development. As you indicate, Natural England's letters identify 3 areas of concern including water resources, the provision of green infrastructure and potential air quality impacts on ecological receptors during operation. We have provided some further comments on these matters below.

Air quality and green infrastructure

The proposed development forms part of the North East Cambridge (NEC) development and Natural England anticipated that strategic matters, including water resources, green infrastructure and air quality, would be addressed through the NEC Area Action Plan (AAP). As indicated in our response to the NEC draft AAP (5 October 2020, ref. 322783) significant uncertainties remain regarding the potential for NEC development to impact the natural environment, including several statutorily designated sites, through changes in air quality, recreational pressure and water-related impacts. We advised that significant measures would be required to address these impacts bearing in mind existing environmental pressures and the effects of NEC development alone and in combination with wider growth including Ox Cam Arc and Waterbeach New Town.

Notwithstanding these concerns we note that the current proposed development is accompanied by a Low Emission Strategy (Brookgate Land Limited, April 2022); Natural England is satisfied that subject to development in accordance with this strategy being secured through an appropriate planning mechanism, the proposed development is unlikely to give rise to significant traffic-related air quality impacts. Likewise, Natural England is minded to accept that the proposed delivery of

informal open space including 'Wild Park', outlined in the Landscape and Open Spaces Plan and other documents, subject to details and delivery being appropriately secured, could provide adequate level of accessible open space to meet the needs of new residents and minimise recreational pressure on existing sensitive sites. On this basis Natural England has no objection to the proposed development with regard to air quality and green infrastructure. However, we still advocate a strategic approach to green infrastructure delivery for wider NEC and other development across Greater Cambridge, as promoted through the emerging Local Plan and the [Cambridge Nature Network](#) to create a connected GI network that will benefit people and better protect more sensitive local and nationally designated sites. Natural England's fundamental concern with the current proposed development, and other major proposals coming forward, is in relation to water resources and over-abstraction of the aquifer as indicated in our responses to the planning consultations and explained further below.

Water resources / over-abstraction

Background

Evidence is being gathered by the Environment Agency, Natural England, water companies and others, to inform the Integrated Water Management Study (IWMS) for the Greater Cambridge Local Plan. This indicates that groundwater abstraction from the Cambridge aquifer, to meet current needs, is already contributing to environmental deterioration including impacts on water dependent SSSIs and supporting habitat. These designated sites are referred to as Groundwater Dependent Terrestrial Ecosystems (GWDTEs) under the Water Framework Directive. In our response to consultation on the IWMS we highlighted those sites we believe to be at particular risk including Wilbraham Fen, Fulbourn Fen, Fowlmere Watercress Beds, Alder Carr, L-moor Shepreth and the Cam Washes; however, the full suite of potentially affected sites may be more extensive than those included in our response.

Water resources, particularly groundwater, are highly stressed across Greater Cambridge and wider East Anglia. The Cam and Ely Ouse Chalk aquifer is failing to meet its water quantity standards and there are numerous river catchments where flows are failing to meet their environmental requirements, with the hydrological regime of groundwater dependent SSSIs regime causing conditions that are too dry to maintain their notified features of interest. Aligned with the Environment Agency's concerns, we are not confident that water can be supplied to new development without risking further deterioration to these sites and supporting habitats, let alone achieve Government environmental improvement targets. For these reasons Natural England is already objecting to planning applications for major development across Greater Cambridge.

It is now widely accepted that East Anglia, and particularly Greater Cambridge, is facing a 'water crisis' due to over-abstraction of the groundwater resource that is the life-support of water-dependent designated sites and other important habitats. There is significant uncertainty around the availability of water supply, from groundwater in the Cambridge aquifer, to meet growth needs without contributing to environmental deterioration – until alternative supply options can be identified and implemented. The emerging Local Plan (First Proposals) recognises this issue and the challenges in identifying long-term and interim solutions to the current water resource crisis to enable sustainable development without further detriment to the natural environment. Natural England's advice is that, pending the identification and implementation of these alternative supply solutions, there is significant uncertainty that water resources to meet the needs of any new major development across Greater Cambridge - alone, and in-combination - with other proposed development, can, at this point in time, be supplied sustainably and without adverse impact to statutorily designated sites and wider ecology, in accordance with the relevant policies of the adopted South Cambridgeshire Local Plan including *Policy CC/7: Water Quality*. Natural England has no principle objection to the proposed development *per se* – our issue is that the water crisis has now reached a potential 'tipping point'. Natural England's view is that careful consideration is required as to whether any major new development can be delivered sustainably and without contributing further environmental degradation until alternative water supply sources and/or measures to reduce further groundwater abstraction become available.

Natural England's detailed concerns are set out in our responses to the Greater Cambridge Local Plan Integrated Water Management Study, the Local Plan First Proposals consultation and the Cambridge Water draft Water Resource Management Plan 2024. We have included copies of our responses for your information, rather than re-iterating the detail here. We have reviewed the information submitted by the Environment Agency for the planning inquiry and we welcome the additional evidence they have provided to support the serious concerns shared by both organisations.

Evidence

We note your request for Natural England to advise the Inquiry on the ecological implications of existing abstraction rates, including any impacts on habitats and/or species (including any Natura 2000 sites) and the implications of increased abstraction on these interests, and whether any potential harm could be mitigated and the appropriate mechanism(s) for mitigation. Whilst Natural England is gathering any available information to evidence the ecological implications of existing abstractions (and potential future increases) it is important to understand that this issue, and the seriousness of the matter in terms of its geographical extent and risks to the natural environment, has only recently come to the fore. The urgency of the situation cannot afford the time-span required to gather empirical evidence hence we need to be guided by the evidence currently available through Natural England, the Environment Agency and others. This evidence indicates that there is significant uncertainty around the availability of water supply, through groundwater abstraction, to meet the needs of new development without contributing further environmental deterioration – until alternative supply options and/or other measures can be identified and implemented.

Further detailed investigation by the water companies is required to determine the impacts that are already occurring and the effects of any potential future increases in abstraction on the notified features of our nationally designated sites. The full suite of designated sites potentially affected is still not fully understood and requires investigation through the IWMS. However, we note that the Environment Agency has evidence that water bodies across Greater Cambridge are being affected by the abstraction of groundwater which is needed to supply existing homes, business and agriculture. Their investigations have identified a number of water bodies where flows are failing to meet their ecological flow targets due to abstraction and that the ecology was sensitive to flow and abstraction in some water bodies, for example the River Granta and River Cam. The Environment Agency also indicate that there is wider evidence of abstraction pressure on Chalk streams, river headwaters and spring flows, groundwater dependent wetlands and reduced resilience to dry weather and drought events and that there is a risk of compounding these abstraction pressures and potentially ecological deterioration if abstraction increases. The health of these affected waterbodies is fundamental to the maintenance of the favourable condition of our designated groundwater-dependent SSSIs. The link between groundwater abstraction, reduced flows and impacts to designated sites is therefore quite clear. For this reason we fully support the Environment Agency's view that action is needed to prevent environmental deterioration occurring by ensuring abstraction does not increase.

Mitigation

Reductions in the current level of abstraction from the Cambridge aquifer is the key mitigation needed to restore the natural functioning (both water flows and chemistry) of nationally designated groundwater dependent sites across Greater Cambridge, and elsewhere. Temporary measures, such as groundwater support / re-charge schemes, to introduce 'wetness' to these sites, offer some interim benefit; however, these are not long-term sustainable solutions and Natural England will not support these.

We will support measures set out in the government's Environmental Improvement Plan 10 point action plan and the UK water efficiency strategy. A key aim should be the delivery of highly water efficient new homes with developers working with water companies to reduce existing consumption, to offset any increase, and ideally ensure a reduction in overall consumption.

Natural England's overarching concern is that there is strong evidence suggesting that the existing level of abstraction is causing harm to designated sites and other important habitat, across Greater Cambridge, and any additional abstraction to meet growth needs will cause further harm. This requires alternative supply options and/or other measures to serve any new major development – and these are currently not available.

I hope the above comments are helpful. If you have any queries relating to the advice in this letter please contact me on 020 802 65894.

Yours sincerely

Janet Nuttall
West Anglia Sustainable Development Casework Manager