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September 2022

## **Anglian Water DWMP Consultation: A response from the Cam Valley Forum**

### **INTRODUCTION**

This is the full consultation response from the Cam Valley Forum to the **Anglian Water Company's Drainage and Wastewater Management Plan**. In this second round, our initial on-line summary response was submitted on 16th September 2022. But this is the second major contributory paper that Cam Valley Forum has submitted on the state of wastewater treatment in the Cam catchment. The first was submitted in July 2021, and contained a fundamental contribution from Dr Alan Woods.

We note that the framework should provide for better collaborative and integrated long term planning. We have seen too little action so far. As a major River group in the Cam valley we are both your customers and stakeholders. In that spirit, as collaborative stake holders, we are critical of some water company performance. We ask that you should not ignore these further key points and take to heart many of the evidences of your past performance that we would wish to see improved.

*The Cam Valley Forum*, a voluntary charitable organisation, works with many other bodies to protect and improve the river Cam and its riversides, including its many tributaries and its sustaining aquifers. As an association of local individuals with diverse environmental, recreational, academic and business interests, we are all concerned directly or indirectly with the rivers in our catchment. This response focuses mainly, therefore, on our group's concerns for the future of the rivers and their environment. We have contributed to many previous such planning discussions and we do urge that you take some of the points below very seriously. The River Cam's waters are enjoyed by thousands:- on the water are rowers, punters, boaters, canoeists and swimmers; whilst many more people enjoy walking, picnicking or angling from its banks. It therefore needs to be a river to be proud of and not ashamed of. Visitors from far and wide come to experience the world-famous Cambridge Backs, yet the Cam has become a failing river.

The Chalk streams in the UK are internationally important in the conservation of biodiversity. The UK has about three-quarters of the world total. This includes our Cam, Rhee and Granta and many of their tributaries. For reasons of long standing environmental abuse, in the Cam Valley, these streams are not among the best (on account of channel modification, abysmally reduced flows and enduring and widespread pollution) but, despite this they are still valued highly for their biodiversity and lowland scenery and for their provision of recreation and well-being for local people. We welcome that a proper consideration of Chalk streams are now on Anglian Waters' planning maps as highly significant to our national conservation position. This need for environmental improvement requires a much bigger investment to ensure that this position is reversed. Largely through our lobbying and the campaigning of many other river supporters something is at last now happening. We are determined to see that our River really improves. There is a tendency to give lip service to genuinely sustainable development without recognising that we humans are part of the ecosystem and are already overdrawn on our Natural Capital. We therefore called on our political leaders to heed the authoritative voice of critics such as Sir David King (former Government Chief Scientist): he made it very clear to a recent meeting of Natural Cambridgeshire that unless you first have ecosystem well-being you cannot contemplate any truly sustainable developments. He is right. All the policies and proposals of your DWMP plan need to be appraised rigorously, in the light of their potential to weigh against past mistakes.

**Only if we have a robust, efficient and resilient drainage and waste water system fully in place before 2050 will people in the Cam Valley catchment be content.**

## Some Detailed Feedback from Cam Valley Forum

These are the **five** key issues **now** that we would request that you study in more depth:

1. **This River Group's Critique of your DWMP methodology**
2. **Factoring in Climate Change**
3. **Our new *Citizen Science* view of the Cam and its Water Quality**
4. **River Basin Management and Flood Risk**
5. **Some Thoughts on future Collaboration**

### 1. This River Group's Critique of your DWMP methodology

The care that has gone into the DWMP planning stages are impressive. You need to recognise that we do appreciate that. However there is a considerable atmosphere of distrust by environmental groups of the water industry that you also need to both acknowledge and now manage. That distrust is not helped by **four things**.

1. The DWMP consultative process is thorough but feedback by tick boxes and little spaces on your form is deeply frustrating and inadequate to the information provision that we feel you still need. As a result of that you will have to allow for this sort of fuller response.
2. Nowhere in your procedures of consultation is there any consideration or evaluation of your own past performance or, indeed, a call for us to evaluate that past performance! This element must detract from our trust for the future as the position is presently not great. Much of Dr Alan Woods work for us, and sent on to you received too little recognition.
3. Do you routinely examine 'the failures' of operations in the past? Surely, yes, but you need to acknowledge it. Were you more attuned to that then the nine listed DWMP steps (from strategic context to final plan) would be trusted better.
4. Population growth, building development and increased urbanisation of once rural areas is quite stressful to residents of this area of Britain. Some development is essential, but when we have experienced decreasing river biodiversity - decade on decade - with loss of wetlands and loss of rural landscapes then no amount of promise of improvement will convince a sceptical public to welcome much change.

If present operations are genuinely unsustainable, as they are already now, we feel that you do have something of a 'trust issue' to face.

### 2. Climate Change

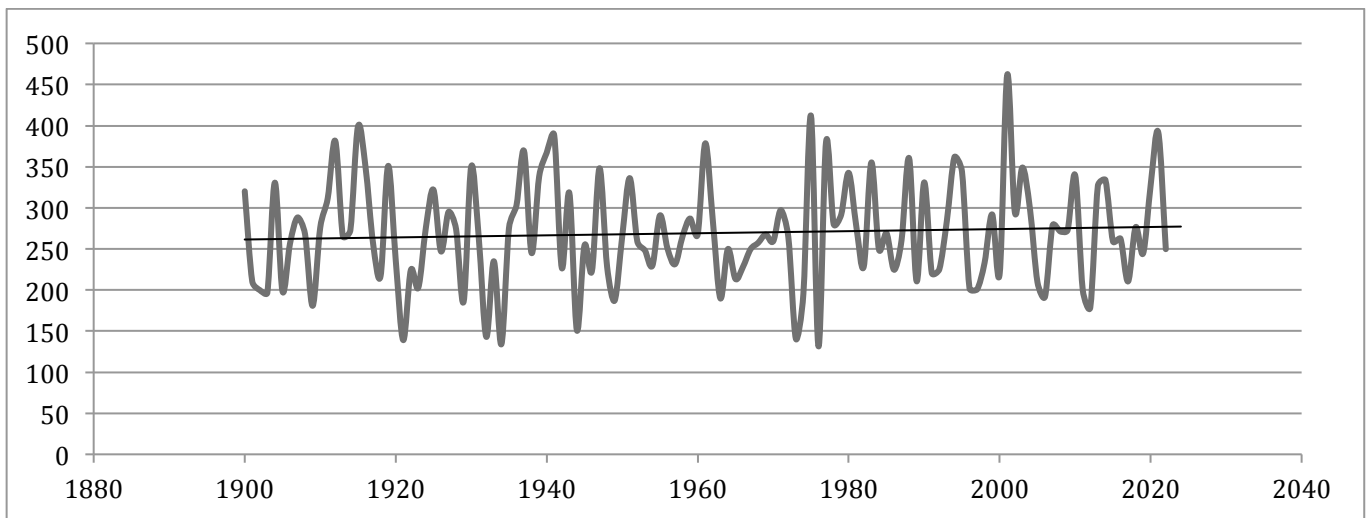
This element is a great unknown for us all. It was unclear in your survey whether you were just seeking from stakeholders their opinion on the degree that 'Climate Change' is important or whether you actually want to know if 'the development planners' have got it right? May be it was both.

**Temperature:** Given that warming has been well over 1° Celsius, and is rising like a rocket, 2° Celsius is at least very probable and the only sensible target to have in mind. 4° is a huge change. There is, however, plenty of evidence of rising summer temperatures, earlier springs and longer summers. This all means greater evapotranspiration. This change has an insufficiently acknowledged impact. We have said this to WRE. If soil moisture deficits are raised more by the higher summer temperatures and longer summer seasons, then the ground-water sourcing of Chalk streams is affected, as eventually also will be the sourcing of public water supply. Summer evapotranspiration presently often exceeds rainfall. Our studies attribute part of the Cam's currently falling river flows to these increased soil moisture deficits. i.e. it takes more rain to wet up the soil before any rain water percolates through to recharge ground water. We live in a drought stressed area.

**Rainfall:** As you recognise, the Cambridge area annual rainfall is low compared to any other English region and is, year on year, highly variable. Droughts and flood events are therefore to be regularly expected here.

Both summer and winter rainfall vary widely, but it is only the latter that has a significant impact on ground water. Public water supply in our catchment is 97% ground water dependent.

**Figure 1. Cambridge Area Winter Rainfall (1900-2021)**



*Cambridge rainfall, summer and winter, is highly variable, year on year. Summer rainfall, one half of the total, does not add significantly to ground water as summer evapotranspiration invariably exceeds the summer rainfall. It is only winter rainfall (**shown here**) that significantly reduces the summer soil moisture deficits. If anything (see graph) this rainfall is trending upwards: its variation has not majorly shifted so with climate change. A lack of rainfall is not at all the sole cause of our presently failing rivers. Ground-water levels have been negatively impacted most of all by over abstraction for public water supplies. It is really only this winter rain that can meet the need for ground water re-charge. Chalk steams will die without it.*

Our 2020 [Let it Flow!](#) report shows that in 24 (41%) of the years 1961-2019 inclusive, winter rainfall did not exceed the previous deficit, so there was in effect then no recharge. When this happens in two consecutive winters, as last in 2018-19, our Chalk streams suffer greatly the following summer. It is relevant here to consider such wider meteorological factors as they eventually affect river flows and thus the degree of dilution of river borne pollution, which is pertinent in your planning of waste management.

Will climate change bring in more rain?

The report of the [Cambridgeshire and Peterborough Independent Commission on Climate Change](#) drew on well-founded national research but not, as far as we are aware, on any detailed local meteorological studies. In our view rainfall has changed very little over the last century. The Commission's report suggests that winter rainfall may increase but the graph above has a trend line showing only a tiny upward trend over the past 120 years; **Anglian Water therefore should not expect any significant increase in winter recharge at present. If anything the inverse trend of drying is in the ascendant** - as more ground-water is abstracted and hotter weather increases soil moisture deficits. There have been much greater droughts in the past than anything experienced recently. We are now close to crisis.

In summary, only winter rainfall adds significantly to the recharge of the chalk aquifer; the local water companies' dependence on this source (97% for Cambridge Water) **therefore certainly lacks resilience in the face of winter droughts**. The Cambridge Water Company's (in our a view an increasingly unsustainable) operation is not your concern. However, we are glad that this problem is now being addressed by plans for a Fen Reservoir. But there is little chance of this physically helping our dire situation before 2035. The reservoir provision alone will not be sufficient for the demand unless water neutrality is assured in all current properties and in all new developments.

### 3. Our new *Citizen Science* view of the Cam and its Water Quality

The Cam Valley Forum sees the DWMP process as a means of alerting Anglian Water to the poor water quality that we, as stake-holders, are aware of. CVF's two main concerns are the health risk from bacteria and viruses from human and animal faecal sources, and secondly the detrimental effects of eutrophication. The first is presently a threat to water recreations such as swimming, and rowing. The second, eutrophication, is if anything more serious. This process is that whereby rivers become excessively enriched with minerals and nutrients such as nitrate and phosphate. This has a significant detrimental effect on the ecological balance of the river and increases the growth of algae and invasive plants such as Floating Pennywort. The latter, an INNS, has cost local people, the Conservators of the River and the EA staff working here much energy, cost and effort. It cost us a huge effort to totally eliminate from our own headwaters. Such excessive plant growth reduces biodiversity, sensitive plants suited to low nutrients decline, and plant decomposition by bacteria results in reduced oxygen levels which harms invertebrates, fish and other wildlife. We have heritage Chalk streams to defend. We want the Cam to become cleaner and less eutrophic. This needs both less pollution, and more abundant flows to dilute and wash away contamination. However, in summer the flow is often so low that it reduces significantly the rivers capacity to cope with Sewage Treatment Works effluent.

#### (a) **Microbial faecal source pollution in the Cam.**

There has been a recent public groundswell of opinion for the river to be cleaned up'. CVF has responded initially by initiating a proposal to create a Designated Bathing Water in the Cambridge locale (see <https://camvalleyforum.uk/cam-safer-swim/>), which if successful would enable the Environment Agency to take statutory indicator bacterial samples. If high levels of bacteria were found there and were linked, for example, to the Haslingfield Wastewater Treatment Works, Anglian Water would need to treat the discharged wastewater to higher standards to reduce the pollution, using methods such as ultra-violet (UV) disinfection.

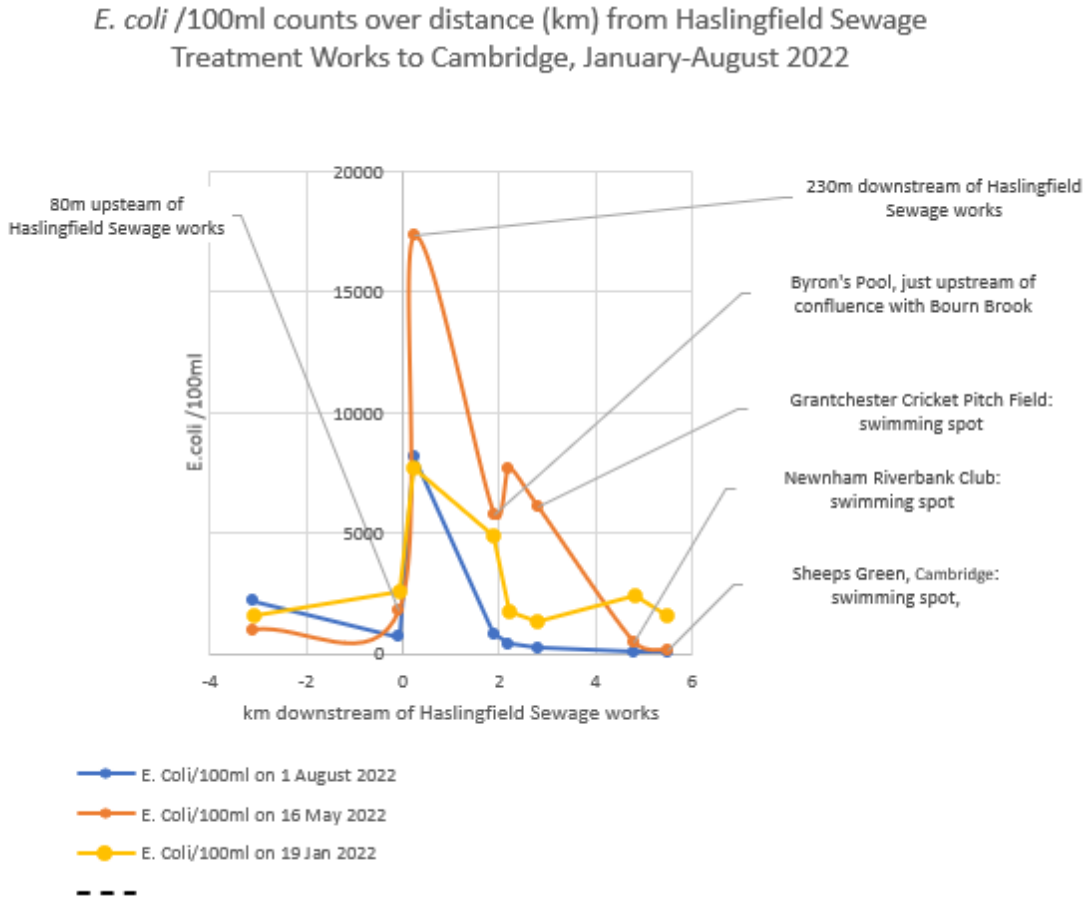
One of our CVF committee, Dr Mike Foley, has led our Citizen Science team to answer the research question "To what extent is faecal source microbial pollution attributable to STW effluent?". The monitoring team have **microbiologically sampled** in all, over a period of 16 months (June 2021-August 2022), on a total of 7 occasions (mornings), with up to half a dozen (two person) teams at a grand total of 47 sites, in 16 different Parishes or designated areas. Some, but not all, samples were repeated at each location, especially where that site produced compellingly indicative results. All samples were taken with great care, and analysed mostly at the UKAS-accredited laboratory of South East Water Scientific Services. *E. coli* counts are 'Most Probable Number per 100ml sample'. *Enterococci* counts are 'Colony Forming Units per 100ml sample'.

The official current standards for Designated Bathing Waters in England are based on multiple bacterial counts by the Environment Agency over a summer season which are used to give the waters a classification status for the following season. Unfortunately, even though swimming is popular in the Cam, the Environment Agency is not testing the Cam as there are none as yet 'designated stretches'.

It would be inappropriate to attempt here any reporting more than a brief summary of our microbial findings, but it is sufficient to say that we found seasonal variations in counts consonant with the situation and climatic conditions. Moreover sites where we were able to test over a range of conditions produced clear indications that a considerable number of small upstream village STWs are regularly delivering to the river 'treated sewage' that might well convey hazardous microbial conditions for swimmers. Although we expect that swimmers and other river users will find the results of great interest, our results CANNOT be used as guidance as to where or when it is safe to swim. We are amateur volunteers, and although our test samples are analysed by a UKAS accredited professional lab, we are NOT testing according to statutory standards set by Defra. There may well be levels of dangerous human pathogenic organisms in the river that our indicator bacteria counts don't reveal, and we know that changes in the weather and rainfall will influence the results. For examples, some of the sewage treatment works above Cambridge provenly do discharge *untreated* sewage mixed with storm

water (one form of combined sewage overflows – CSOs), and when Cam Valley Forum has had the opportunity to sample, elevated counts of indicator bacteria are found, which belies the oft stated view of water companies - including Anglian Water - that the overflow comprises only “extremely diluted” sewage. As our database builds we have been able to paint a more consistent picture.

**Figure 2.** below shows the variance in the faecal indicator *E.coli* upstream from Harston down to Haslingfield (STW), then on down to the popular bathing places on the Cam at Grantchester Meadows and Sheep’s Green.



We have no doubt that the greatest microbial faecal threat to Cam recreational water users is from such human effluent sources.

The EA Assessment table below is indicative of what they might adjudge to be pertaining on our river.

**Inland Bathing Waters**

<b>Excellent</b>	EC: ≤500 cfu/100ml ; IE: ≤200 cfu/100ml (95th percentile)
<b>Good</b>	EC: ≤1000 cfu/100ml ; IE: ≤400 cfu/100ml (95th percentile)
<b>Sufficient</b>	EC: ≤900 cfu/100ml ; IE: ≤330 cfu/100ml (90th percentile)
<b>Poor</b>	means that the values are worse than the ‘Sufficient’

See also CVF links <https://camvalleyforum.uk/water-quality-test-results/>

**For CVF Water quality reports** on *A storm overflow event from Haslingfield Sewage Treatment Works, and monitoring and testing in the Cam and its tributaries: bacterial indicators of faecal contamination.* see <https://camvalleyforum.uk/publications/>

**We are grateful to our sponsors (including AW) and our own supporters for their funding of this work.**

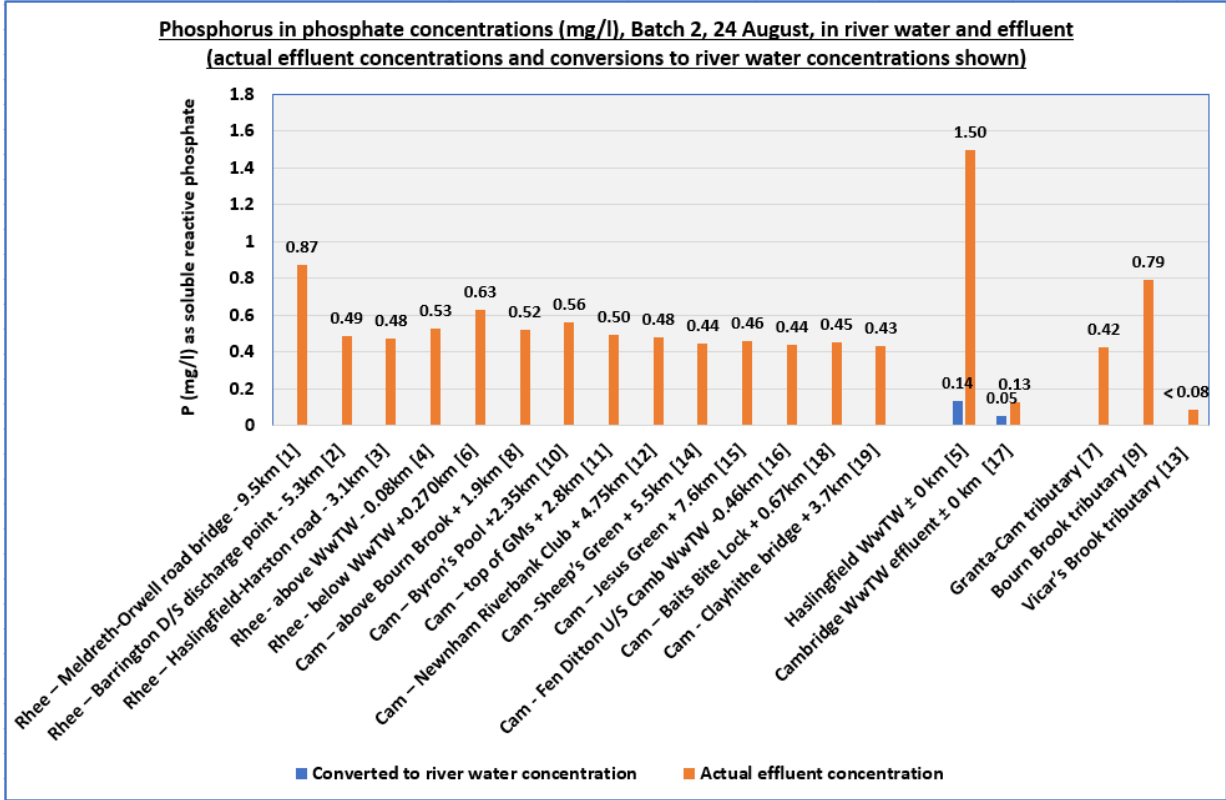
### (b) Phosphate and Nitrate pollution in the Cam

Phosphate and nitrate pollution are not as big a problem, in the public eye, as faecal pollution but we have no doubt that they have a significant detrimental effect on the ecological balance of the river. Indeed they are a killer for Chalk streams and a driver of biodiversity loss within them. For this reason we have, under Dr Mike Foley, employed our Citizen Science team simultaneously to sample for these components. Nitrate levels are high throughout our regional aquatic ecosystems. Phosphate alone, without nitrate, is much less harmful, but with the very high and prevalent nitrate levels in the aquifer it is the phosphate that does the most harm. This project was to answer our second research question “To what extent is soluble reactive phosphate pollution attributable to STW effluent?”.

In total some 16 sites were sampled on 11 dedicated Phosphate testing days. Again samples of river water or sewage treatment works' final-effluent were taken by volunteers and were again analysed at the UKAS accredited South East Water laboratories. All values are expressed as Phosphorus (mg/l); lab method was soluble reactive phosphate. Nitrate values are nitrate (mg/l), not N in nitrate.

Figure 3

This bar chart below shows one such river sampling day’s results, from 24 August 2021. On the chart the phosphorus as soluble reactive phosphate (mg/l) river samples are shown, from upstream (left) to downstream (right). These are followed by two STWs (WwTW) and 3 tributary contributions. The distances (km) are those above and below Haslingfield STW. The two ‘Rhee’ samples are either side of the Haslingfield STW. For the two STWs the phosphate addition to the river (after effluent dilution) is shown in blue.



In this month of August, 2021, when weed growth was at its peak (absorbing much of the available reactive phosphate) river background levels are clearly in the region 0.45 - 0.65 mg/litre in the stream flow, but the unquestionable prime source has always been found by us to be not so much farm sources as the numerous small rural STWs.

All the mean results that we have recorded for the STWs are shown in the **Figure 4** (table) overleaf.

**Figure 4 (Table):** Mean values of soluble reactive phosphate, reported as Phosphorus (mg/litre), Total Phosphorus (mg/l) and nitrate (mg/l) recorded from sampled treated sewage effluent from predominantly rural Sewage Treatment Works that discharge into the River Cam and its main tributaries. Only the “Cambridge STW” (Cowley Road, Milton) is downstream of the City of Cambridge. STWs are ranked by their pollution contribution (worst to least).

STW			Number (Phosphorus- SRP)	Mean Phosphorus-SRP (mg/l)	Total Phosphorus (mg/l)	Number (Nitrate)	Nitrate (mg/l)
Bourn STW			1	7.838		1	35.70
Quendon STW			1	7.034		1	189.10
Newport STW			1	6.520	6.230	1	63.60
Linton STW			5	5.971		2	111.05
Great Chesterford			1	5.092		1	-
Melbourn STW			3	4.837		-	-
Bartlow Barns private STW			1	3.930		1	-
Bassingbourn STW			1	3.682		1	89.30
Foxton STW			3	3.630		-	-
Ashdon STW			2	3.039		1	151.20
Shudy Camps STW			2	2.813			
Haslingfield STW			6	0.892	1.780	2	69.35
Sawston STW			3	0.730		-	-
Saffron Walden STW			1	0.684	0.950	-	-
Ashwell STW			1	0.430		1	99.20
Cambridge STW			5	0.396	0.260	1	77.90
Huntsman/Hexcel private STW			1	0.090		-	-
Litlington STW: (Wilfred Bourgeois, AWS, 6 Dec 2021): "PO4-P readings of the final effluent...typically around the 8mg/l mark.							

If **Anglian Water** need an imperative for action it lies in the worst mean figure we have encountered. This is at the foot of the table. This was an Anglian Water staff monitor recording.

Also, we now have ample direct evidence that SWT effluent can markedly increase the levels of phosphate in the watercourse. An example is **Melbourn STW**, soluble reactive phosphate levels (reported as Phosphorus, (mg/l): upstream of the outfall on the Mel - 0.057 (two samples); effluent - 4.837 (3 samples); downstream of the outfall in the Mel - 3.338 (2 samples). At low river flows the inability of the river to attenuate the pollution is marked and unacceptable.

In the Water Framework Directive, rivers are classified for phosphate status according to the bands of phosphate-phosphorus.

WFD standards for phosphate-phosphorus (P/ mg/l) in a lowland (<80m AOD). high-alkalinity river such as this are defined as:-

Status	High	Good	Moderate	Poor	Bad
<b>Bands</b> mg/l	0.000 - 0.050	0.051 - 0.089	0.090 - 0.211	0.212 - 1.089	> 1.089

In a nutshell our Cam water pollution, by our reckoning, is presently of POOR, or at best little better, MODERATE status. It is only better status than this at groundwater spring sources. This was pointed out to Cam Valley Forum first by the EA in 2018 at a CameO meeting. One can only wonder at the powerlessness of the EA, to adequately regulate legislation, that this manifests to us for Anglian Water to put their own house in order.

The database we have seen lists **37 Sewage Treatment Works (STWs)** in the Cam catchment, divided between 18 ‘large’ works (>2,000 population equivalent) and 19 ‘small’ works (< 2,000 population equivalent); and 39 private facilities (septic tanks, etc.) that discharge to watercourses. The latter are not

assessed here. We have used ‘sewage works’ or STW as shorthand for what is also called a ‘waste water treatment works’ or ‘Water Recycling Centres’ (WRC), Wastewater Treatment Works (WwTW), or Plants (WwTP).

We know that projected improvements are underway but our results question Anglian Waters priorities for a new large urban STW when that existing at Milton is currently still below capacity, whilst so many others are either clearly completely overloaded, or are fast approaching overload as yet more housing developments add to the burden.

#### **4. River Basin Management and Flood Risk**

Flooding is an ever-present concern. Cam Valley Forum is pressing for a more integrated approach by the Environment Agency, Natural England, farmers and Local Authorities. The Local Plan recognises that episodic ‘flooding’, may be increasingly likely with climate change. This can be mitigated upstream by slowing river drainage. We have had over 60 years of ill-advised river dredging in our lowlands to increase arable areas on farms. To reverse this trend of flood plain disconnection would help. This more ‘natural’ approach to flood plain management would require a reversion to an earlier pattern of agricultural land-use management with wet meadows and less arable land in the flood plain itself.

Some river valley farmers are already making this positive change. e.g. South Cambridgeshire could develop a larger flood plain basin with a wet woodland as a buffer against future Cambridge City flood events. This wet woodland would impede rapid flow, so attenuating the flood, save water, sink carbon dioxide and ease soil erosion. Such wet woodland sites could also provide great benefits to biodiversity and even recreational areas. The present heavy winter flood events are losing good soil from our farmlands. Restoring riparian grazing grasslands would sequester carbon efficiently - an added bonus to our carbon depleted soils.

We fully support Greater Cambridgeshire Partnership policy, which includes directing development away from floodplains, the incorporation of SUDS (sustainable drainage systems) into new developments (including the use of mitigation wetlands and permeable surfaces), and ensuring that new development does not increase flood risk elsewhere.

With respect to Storm Overflows we expect of course Anglian Water to become fully compliant with DEFRA legislation on CSO reductions. We support the Storm Overflow Action consultation. Cam Valley Forum considers CSOs presently to be less of a threat to our rivers than the overload of smaller STW (Water Recycling Centres) that presently seems to have been allowed to reach unacceptable levels by the Environment Agency as the regulator.

#### **5. Some final thoughts on collaboration and partnership working.**

In this Anglian Water DWMP Consultation, we do note the positive tone of getting “River Positive” and “Love Every Drop” etc. It is important to be positive, but public cynicism is also fostered by marketing messages that are not supported by reality. Cam Valley Forum hopes to remain as loyal collaborators with a better trusted Anglian Water Company! We would like thank Anglian Water for their support of CamEO, our catchment based partnership and of bodies like the Rivers Trust. This has been appreciated. However, ‘the environmental voice’ is distinctly weakened by the fact that there is no commercial vested interest tied to our own operations! We appreciate that in 2019 you became the first utility company to have consideration of wider social and environmental impact written into your Articles of Association - the legal documents that underpin the foundation of your business. However, in our view the present governance of the ‘Water Commons’ that is represented by the water environment remains the weakest link in achieving improvement. This could be better achieved through linking with WRE and establishing catchment partnerships as stronger elements in the whole monitoring and regulatory framework. That is the ideal that we seek.



For your part, we would value you challenging some other assumptions and weaknesses that we see.

### 1. **Climate Change.**

We question the good sense of the Government's calculation of the overall risks from climate change to future population growth in this region. Year on year, many risks appear to be increasing (from sea level change to much higher temperatures); **the precautionary principle** needs to be to the fore in this already densely crowded and low-lying region. You cannot easily plan to mitigate a powerful rising trend. There is no better example of an abused ecosystem just asking for help.

2. **Better Water Company and EA cooperation.** Can we see better cooperation between water companies within WRE? In the Cam Catchment, in 2022, three water companies abstracted > 105 Megalitres/day from the Chalk aquifer (Cambridge Water 64%, Affinity Water 22% and Anglian Water 14%). The Environment Agency abstracted a further 15 MI/day to augment flows on Cam Valley Chalk streams damaged by water company abstraction. It is frankly unsustainable to go on like this. The environment deserves better. To us it seems that the 'Water Commons' is exploited by each agency with too little recognition of the other. We would like to see a 'Chalk Streams First' policy for conservation reasons alone. The environmental and recreational benefits thereof are huge. The Environment Agency has already requested a 60-70% cut in abstraction to restore flows to acceptable levels. It has not happened yet. Is the EA really so powerless to regulate? Are you in Anglian Water prevented from looking after the Environment better without stronger policing or stronger political support ?

3. **Anglian Water helping out Cambridge Water?** More pointedly Anglian Water is not interested in Water recycling to anywhere but the river. Why not to the tap? Cambridge Water have not been interested in the least in having a reservoir if they can help avoid it, they have had a good source, but it is dwindling fast. Until the proposed Fens and South Lincolnshire reservoirs come on line in the 2030s, to possibly save our chalk streams, all the companies should be forced to cap excessive abstraction and supply new demand in Greater Cambridgeshire by water transfers from surface water sources to the west and the north. We want this policing by the EA and Natural England as we just do not see it as ever being your priority. Please prove us wrong.

SPT/MF

Cam Valley Forum  
September 2022

### **Appendix**

Our website <https://camvalleyforum.uk/> provides links to further information, including:

The Government's proposed strategic priorities for OFWAT: <https://camvalleyforum.uk/wp-content/uploads/2021/10/CVF-response-to-Defra-strategic-guidance-to-OFWAT-15-10-21.pdf>

Green infrastructure (July 2020): <https://camvalleyforum.uk/wp-content/uploads/2021/02/Cam-Valley-Forum-Green-Infrastructure-response-25-07-20.pdf>

Tentative proposals for a Bathing Water designation (January 2021): [https://camvalleyforum.uk/wp-content/uploads/2021/02/cvf\\_swimming.pdf](https://camvalleyforum.uk/wp-content/uploads/2021/02/cvf_swimming.pdf) and the responses to that consultation: <https://camvalleyforum.uk/wp-content/uploads/2021/03/Cam-Valley-Forum-Responses-to-Bathing-Water-Proposal-08-03-21.pdf>.

Let it Flow! (May 2020): [https://camvalleyforum.uk/wp-content/uploads/2020/05/Cam\\_Valley\\_Forum\\_Let\\_it\\_Flow\\_Full\\_report\\_26-05-20-compressed.pdf](https://camvalleyforum.uk/wp-content/uploads/2020/05/Cam_Valley_Forum_Let_it_Flow_Full_report_26-05-20-compressed.pdf)

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