

**Cam Valley Forum comment on planning application
23/03204/OUT for the Beehive Centre, 10 October 2024**



Cam Valley Forum is very concerned to see Anglian Water's statements relating to their lack of capacity to deal with foul water from the development and the unacceptable increased risk of downstream flooding. We urge planners to impose conditions to prevent unacceptable harm to residents and the local environment.

In respect of Foul Water treatment capacity, Anglian Water (27 Sept 2024) say *"The foul drainage from this development is in the catchment of Cambridge Water Recycling Centre which currently does not have capacity to treat the flows from the development site. Anglian Water has applied to the Environment Agency for an interim new permit to address exceedance"*

In simple language, this means that, if permitted, this development will be allowed to increase the level of pollution in the Cam. We know from our work on Bathing Water Designation, that at times rowers have already become seriously ill as a result of faecal contamination. We are also aware from our monitoring work that Life Sciences labs can produce very significant levels of phosphate pollution. We have already seen mass fish die-off in the Cam in summer, so any increase in the risk of eutrophication is unacceptable.

We understand that Anglian Water has no power to refuse to connect a residential development to the sewage system, which makes it difficult for the planners to refuse permission because of the lack of treatment capacity. However there is no duty to connect a non-residential development. As the proposed development includes life sciences labs, which could produce a significant quantity of contaminated foul water and phosphate pollution, we urge the planners to protect the health of the river, and river users.

We suggest imposing a condition that there can be no occupation (at least for non-residential use) until there is adequate foul water treatment capacity available, whether onsite, or offsite. Note that a variety of solutions are available for onsite waste water treatment, including Phosphorus removal.

<https://www.sciencedirect.com/science/article/pii/S2214714417307985>

In respect of flooding, Anglian Water say : *"Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream.*

They point out that the planning application states that *"The APPENDIX 8.1A ..submitted with the planning application ... states that the surface water runoff from the Proposed Development will be managed sustainably at source, utilising a suite of SuDS measures and water quality enhancements integrated within the hard and soft landscape"*

They continue *"When a site is being redeveloped there is no historic right to connect and we therefore would require that the applicant explores alternative surface water disposal methods for the proposed development site before a connection into the Anglian Water surface water network can be considered"*

As the area is already at significant flood risk, and climate change will only make this worse, we call for a condition to be imposed that all surface water runoff must be managed on site, with no greater connection to public drainage than would naturally occur at a green field site. This should stimulate exemplar levels of SUDs and onsite water recycling.

We urge the Greater Cambridge Shared Planning Service, the developers and Anglian Water to collaborate, in order to demonstrate that it's possible to create an exemplar project in our highly water stressed region, combining genuine environmental sustainability with regeneration and economic growth.

Cam Valley Forum, 10 October 2024