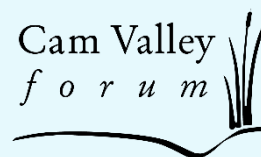


Cam Valley Forum Submission to Draft Local Plan Consultation, January 2026



Cam Valley Forum's submission to the Draft Local Plan focussed on four policy areas

- Policy BG/RC: River corridors
- Policy CC/FM: Managing flood risk
- Policy CC/IW: Integrated water management, sustainable drainage and water quality
- Policy CC/WE: Water efficiency in new developments

Here is what we said:

Policy BG/RC: River corridors

Type: Comment, ID: 205461

Summary:

The River Corridor is in many ways the central focus for all those who live and work in Cambridge, and to a large extent the economy and well-being of the City depend on it. The policy must be worded to ensure that any developments that risk generating a negative impact on the biodiversity, ecosystem services provided, and amenity value will not be approved. We strongly support the requirements for creating a riparian buffer zone and are concerned that some of the exceptions suggested could prevent the realisation of this concept. The policy must reflect the good guidance that is now available on establishing such zones.

Full Text:

We generally support this policy but would like to see the following amendments: Point 1. We recognise that the order in which these requirements are listed may not represent their significance or priority, but developers and others may well consider that this listing reflects a priority order. We strongly recommend therefore a re-ordering of this list as follows (a-f):

- a. Protects, enhances and restores natural features, including:
 - i Supporting the renaturalisation of the rivers and their processes;
 - ii. Restoring natural floodplains and integration of nature based solutions to protect communities at risk of flooding;
 - iii. Establishing riparian habitats where appropriate. We consider this to be the overarching requirement of a development along a river or tributary
- b. Ensures that the location, scale and design of development protects and enhances the character, biodiversity, visual amenity and historic significance of river corridors and connected locations.
- c. Protects and enhances the existing landscape of river corridors, referring to the Landscape Character Assessment and the Local Nature Recovery Strategy for guidance.
- d. Supports enhanced access to, from and along river corridors for walking and cycling, whilst balancing this with the need to protect and enhance habitats for biodiversity, including:

- i. For the river Cam, supporting the delivery of a continuous Cam Valley Trail.
- ii. Enhancing connections between the rivers and other green spaces.
- iii. Providing improved wayfinding and interpretation resources.

e. Protects and enhances views to and from the river.

f. Supports tourism and recreation associated with river corridors in appropriate locations, whilst ensuring that this does not impact negatively on the other roles of a river

As currently worded, the implication is that ALL development on the river and/or tributaries must demonstrate the requirements in the above list. We think this risks encouraging development in some places: for example, not all developments should be required to support recreation and tourism, and in particular would like to see this clause removed. We would like to see an additional point added, requiring that any developments along the river/tributaries should demonstrate that they will not damage riverine nature reserves, SSSIs and other designated protected areas.

Point 2. We very much support the requirement for a riparian buffer zone and recommend it fully reflects the recommendation for such areas in the Cambridgeshire LNRS RD5B (establish uncultivated riparian buffer zones at least 15 metres wide from the top of the bank (including the 9 metre internal drainage board bylaw maintenance corridor) and in this area plant or promote low growing, non-woody vegetation such as diverse grasses or wet grassland mixes that are compatible with regular ditch maintenance operations, to provide habitats for nature). However, we have significant concerns about the exceptions proposed as these could be interpreted in many ways and strongly recommend that these are removed or re-phrased.

Policy CC/FM: Managing flood risk

Type: Comment, ID: 205357

Summary:

This policy needs to make it very, very clear that the risk of flooding has greatly increased with the rapid acceleration of climate change and the unpredictable nature of rainfall as evidenced by recent events in many parts of the country. The Greater Cambridge area should not consider itself immune to such events. We do not think this policy is sufficiently strong to provide adequate management of flood risk. We have provided some suggestions for improvement but would like this policy to be rethought more carefully, given the scale of development that is anticipated within the life of this plan.

Full Text:

This policy needs strengthening to avoid the current situation where pressure on the planners (and Councillors) results in approval of planning applications on potentially floodable land, as has happened in the recent past in the Cambridge area, despite warnings and objections that have focused on this eventuality.

One example is the AstraZeneca centre on the Cambridge biomedical campus location in the vicinity of Nine Wells, where this problem was raised at the consultation stage by the Cam Valley Forum and others. The location is a "periodic wetland", where groundwater comes to the surface, but the warning was ignored and deep storage accommodation was built without totally tanking the basement. This resulted in substantial and very costly water-related building

issues due to the bad planning judgement. Similarly, flooding was predicted in Gough Way before development started there, but flooding occurred first in 1978 and then subsequently in 2001.

This policy needs to make it very, very clear that the risk of flooding has greatly increased with the rapid acceleration of climate change and the unpredictable nature of rainfall as evidenced by recent events in many parts of the country. Cambridge should not consider itself immune to such events.

The Cambridge plan for development in the riverine environment must be shown to conserve Cambridge's distinctive "Rus in Urbe" character. The city was built adjacent to the river flood plain. The Cam will always be a lowland river in a flood plain where avoiding flooding of properties has long recognised the importance of the river flow per se having space and not being over constrained within the aegis of its flood plain. Historically, 'planning' was for the river, which led to the extensive rural flood plains with grazed meadows, the College backs, the several Greens and several Common that otherwise would be only covered in urban buildings. Cambridge has always had this character 'countryside in the town' character and it now needs to be enshrined in formal planning.

Point 1a: we recommend deleting the exception stating "(this is not necessary if the proposal is on an allocated site and consistent with the allocated use)." Removing this exception would ensure that flood risk is assessed consistently for all developments, recognising that allocation does not remove or reduce real and increasing flood risks under climate change.

Points 1g. and 1h. We agree with these two policies about refusing developments that would result in an increase in either the rate or the volume of run-off post development compared to predevelopment. However, in the long term, developments change in character both during construction and after being built. If surfaces are subject to change (e.g. paving over of gardens) it is well known that flooding may more easily happen. Monitoring such small but cumulative effects is largely neglected, and the policy needs to require future monitoring by responsible authorities to avoid such situations.

Point 2. We think that a site-specific Flood Risk Assessment (FRA) should be a requirement for all developments in Flood Zone 1, not only those situations singled out. With the increasing variability in rainfall patterns, it is very difficult to determine which locations are likely to be risk-free – the risk of flooding generally is accelerating rapidly and worsening on an annual basis.

Document: Draft Greater Cambridge Local Plan for consultation

Policy CC/IW: Integrated water management, sustainable drainage and water quality

Type: Comment, ID: 205261

Summary:

Whilst supporting several aspects of this policy, particularly the integrated approach, we do not think it gives adequate attention to waste water and would like to see that as a separate policy. Given that many SuDS in Cambridge are not proving successful, the policy relating to SuDS needs strengthening.

Full Text:

We generally support this policy but would like to see 'water quality' as a separate full policy, given the impact that current development has already had in creating the poor quality of water which emanates from Sewage Treatment Works into our rivers in the natural environment. This is exemplified by the fact that Haslingfield STW has now been categorically shown to need massive remediation by Anglian Water. The policy would need to address the many aspects of a development that contribute to poor water quality in the natural environment, with developers being required to demonstrate that any waste water generated during construction and use of the development will not have a negative impact.

We support the requirement to make use of nature-based solutions where practicable (Point 1d).

However, for Point 4e. we recommend amending "where reasonably practicable" to "wherever practicable" as in 1.d, since permeable hard surfaces are essential for effective drainage.

Point 4h. Given that maintenance of SuDS is fundamental to their long term function and that many SUDS in Cambridge do not function correctly (e.g.

- (a) the Trinity Gate development where a SuDS maintenance plan was a planning condition and required features within private curtilage to be maintained by owners - however, the owners do not seem to have been made aware of this and it is unclear if the SuDS will be maintained properly; and

- (b) the new development behind Thornton Road, where the new 'wetland' created by the SuDS is highly unstable, fluctuating between a dried wasteland of herbage and inundation by flash floods).

Point 4h should therefore also include very specific wording to require responsibility for management and maintenance to be clearly assigned, , including details of activities required for future management and maintenance.

Policy CC/WE: Water efficiency in new developments

Type: Comment, ID: 205210

Summary:

Although we support several aspects of this policy, it needs strengthening to reflect the current water crisis. The 80 l/person/day standard should apply to all new housing, and non-residential developments should be required to align with full BREEAM water credits. The wording should be that recommended in the 2025 "Shared Standards" for Local Planning Authorities, which is stronger and clearer, for example expressly requiring Water Efficient Design Statements and completion certificates, as well as smart meters and leak detection.

Full Text:

We broadly support the requirements made under this policy but, given the severe water stress in this region, there is a need for strengthening some areas. The title of this policy should be changed to 'Water efficiency in refurbishments and new developments', given that this policy applies to planning applications that involve refurbishment as well as new developments.

Point 1. We support this.

Point 2: we feel it extremely important that the 80 l/person/day standard should be applied throughout.

We recommend deleting point 2b and amending point 2a to read "for all new residential developments, regardless of number of dwellings, a maximum water usage of no more than 80 litres/ per person/ per day."

Point 2c, the wording needs updating to reflect the new 2025 "Shared Standards" for Local Planning Authorities (a collaborative initiative by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England). The Shared Standards recommends that the following, stronger, wording is used: "For new, extended or redeveloped non-residential buildings, full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not practicable for the development."

Point 2e. (proposals involving the refurbishment or change of use of existing buildings should undertake retrofitting to increase water efficiency). The following sentence should be added to this to clarify the requirement: 'For example WCs with flushes of 6 litres or more should be replaced with 3-4.5litre dual flush cisterns, and aeriated taps and shower heads should be specified. Water efficiency proposals should be set out in the sustainability statement.'

Point 3 (concerning how water efficiency is demonstrated) should also be reworded to reflect the recommended wording of the Shared Standards: "A Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following: a) Baseline information relating to existing water use within a development site; and b) Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling)."

Point 4. We support this, but propose adding reference to SMART meters as follows: "Each individual dwelling, including flats within a larger building, must have its own water meter (preferably a SMART meter) to enable the monitoring of water use and a leak detection system".

Point 5. We support. We recommend that two new points are added to reflect the new Shared Standards:

New point 6: "Prior to the first occupation of development a completion certificate shall be submitted to the Local Planning Authority confirming the design standard has been verified and fully implemented."

New point 7: "All new and refurbished buildings must be fitted with an in-property leak detection system by 2030, capable of rapidly notifying the occupant of any internal leaks within 24 hours. Where feasible, this should be integrated with a smart water meter; if not, an alternative effective leak detection device should be installed."