



Friends of the Cam
contact@friendsofthecam.org

6th December 2021

To: Greater Cambridge Shared Planning Service
c/o Cambridge City Council,
PO Box 700,
Cambridge CB1 0JH

and

c/o South Cambridgeshire District Council,
South Cambridgeshire Hall,
Cambourne Business Park,
Cambourne,
Cambridge CB23 6EA

Ref: Consultation Response - Draft Local Plan

Friends of the Cam strongly object to the level of growth proposed in the new Draft Local Plan on the following grounds: inadequate water supply, effect on national food security, failure to minimise climate change, likely irreparable damage to ecosystems, carbon emissions resulting from construction, lack of an integrated public transport system, undermining of the Government's policy of 'levelling up', and a democratic deficit in the process and evidence base .

We provide evidence for each of these reasons below.

Inadequate Water Supply

Cambridge City and South Cambridgeshire already have an unsustainable supply of potable water. In August 2020, the Environment Agency, in response to a query on the viability of water supply to Northstowe Phase 3A [wrote to Monica Hone](#) that '*current levels of abstraction are causing environmental damage. Any increase in use within existing licenced volumes will increase the pressure on a system that is already failing environmental targets*', and '*many waterbodies did not have the flow to support the ecology.*'

On the 1st July 2021, DEFRA announced that chalk streams would be given enhanced environmental protection, and published the Environment Agency document titled "[Water stressed areas – final classification 2021](#)" which included the fact that the supply areas of Cambridge Water and Anglian Water are areas of serious water stress, page 6.

According to [Appendix 3](#), Cambridge Water needs to reduce abstraction by 22 megalitres per day from levels current at 1st July 2021, and Anglian Water needs to reduce abstraction by 189 megalitres per day from levels current at 1st July 2021.

Yet, one of Anglian Water's proposed 'solutions' to this problem is to pump water from North Lincolnshire, which is also classified by the Environment Agency in the above report as a water stressed area.

Inadequate Wastewater Infrastructure

Nearly all the growth suggested in the Draft Local Plan will lead to new building with an associated increase in the area of artificial surfaces. Of course the developers will claim this can be off-set by the use of badly designed Sustainable Drainage Systems, SuDS. These are often artificial bodies of pondwater constructed close to developments. It is essential that safe and effective, design and implementation of SuDs is adequately enforced.

The local sewage system is currently inadequate. The inadequacy of the sewage system is evidenced by the [number of sewage spills](#) by smaller Anglian Water sewage works into the Cam Valley. Currently, there are no plans to improve failing combined sewer overflows (csos), just promises to monitor them more accurately. The Cam Valley upstream of Cambridge saw 622 hours of untreated waste water enter the rivers in 2020, yet Anglian Water is proposing to move the one sewage works in the area which has been upgraded and has sufficient capacity until 2050, the main Cambridge works, into the Green Belt and to spend at least £227 million of public money to do so.

To date there have been no upgrades at any of the smaller works in the area while more and more taps are still being connected. The Environment Agency has already warned at least one Cambridgeshire local planning authority, East Cambs District Council, that they must stop looking at the sewage requirements of single planning applications and instead look at the cumulative effects.

Threat to National Food Security

According to the government [the UK currently imports 45% of its food](#), however, some sources estimate this to be [as much as 80%](#). An accepted value used frequently in the press is 60%.

According to the NFU, the Fens produce one third of England's fresh vegetables, 20% of England's potatoes, more than 20% of England's flowers and bulbs, 20% of England's sugar beet as well as a significant percentage of the country's cereal, oilseed rape and protein crops. Agriculture employs 80,000 people and produces £3bn pa for the rural economy.

Farmers can only produce this food if there is water available for irrigation, if the land is protected for food security and is not sold to developers or covered in solar panels. The national food supply will be severely reduced and much of it completely lost if there is further inward migration to Cambridgeshire. Firstly, there will be a tragic loss of the best and most versatile land due to building and secondly, there will be a further demand on the available water supply. Both effects will be due to the proposed unsustainable growth as a further 100,000+ people (based on the addition of 49,000 houses multiplied by average UK household of 2.4) are drawn to the area using a further 16 megalitres of water per day, (based on a realistic 140 litres per person per day).

Furthermore, the Fens are at increasing risk of annual and eventually permanent flooding. See next section below.

As can be seen from NFU figures, when the Fens do flood, the national food supply will be reduced by an estimated 20 – 25%.

Sea level rise

Large areas of Cambridgeshire, including parts of the City of Cambridge, are subject to continuously increasing flood risk. Indeed, not only is sea level rising, the rate of sea level rise is increasing rapidly. For many years, since measurement began, sea level in the Wash was rising at a rate of 3mm per year. In 2019 it was measured by the Environment Agency in the Wash, and confirmed by IPCC figures globally, that the annual rate was now 3.3mm per year. In 2014, the IPCC report estimated a sea level rise of 1 metre by 2100. In 2019, the IPCC increased this estimate to 1.1 metres by 2100. In 2021, the IPCC has increased its estimate again, to a terrifying 2.4 metres by 2100. Meanwhile, the meteorological partnership Climate Central estimates a 4.7 metre sea level rise by 2100 if global temperatures rise by 2°C. Both the IPCC 2021 and the COP26 leadership have confirmed that the world is currently on track for a 2.4°C global temperature rise.

The other solution to Cambridgeshire's water shortages being proposed by Water Resources East and Anglian Water is to build two reservoirs in the Fens, one in South Lincolnshire, the other in Cambridgeshire near the River Great Ouse. However, there is little point in building reservoirs in the Fens when it is clear that there is a high risk they will be flooded by saline water within decades. This greenwash simply won't wash.

As flood risk increases, the Fens will initially be subject to occasional and then annual flooding caused by water in its tidal rivers meeting increased volume of run-off from development. Eventually, the tidal inflow will prevail and flooding will become permanent as the sea level inexorably increases. However, even the first stage will have a significant negative effect on agriculture. The Treasury Green Book assumes loss of cropping for one year if sea water inundation occurs. In fact, as was found in the 1947 and 1953 floods, reduced crop yields last up to seven years due to the presence of a nematode in sea water.

Irreparable Damage to Ecosystems

Contrary to the [widely touted propaganda](#) that somehow 'development will help nature thrive', evidence shows that any [increase in artificial surfaces](#), such as buildings and roads, leads to a decrease in water in the environment. Development also leads to a decrease in the amount of land that can absorb rainwater and recharge water bodies. According to the Royal Horticultural Society, [70% of ponds have been lost](#) from the UK countryside since 1970. The River Cam has lost on average [half its flow](#). In 2019, the River Granta dried up completely. Freshwater biodiversity populations have [declined by 84%](#).

Concepts such as 'doubling nature', Biodiversity Net Gain (BNG) and Natural Capital Accounting (NCA) are being used as bargaining chips in the developers' casino that broadly amounts to saying, 'No development means no funding for nature'. This is the antithesis of John Lawton's 2010 plea in 'Making Space for Nature' of significant funding for Nature conservation *without any strings attached*.

The concept of doubling nature is ill-defined - doubling what, exactly? The Draft Local Plan needs to define exactly how the concept will be understood and measured.

The global experience of [Biodiversity Net Gain, reviewed by zu Ermgassen of DICE, University of Kent](#), is that it fails twice as often as it succeeds, even though it had the lower bar of No Net Loss, NNL rather than BNG.

The same group more recently showed that 95% of early-adopters of BNG practices in England are carrying out on site offsetting (something not covered at all in the new Environment Law), where the developer is the judge, jury and executioner of any offsetting plans. In any case, on site offsetting will not encourage many forms of wildlife and will be prone to the dog-fouling and trampling that harms many wildlife areas, even

those remote from housing. Meanwhile, off-site off-setting is already damaging local communities in some rural areas.

Natural Capital Accounting is an untested concept. The monetary assessment of ecosystem services (the 'yields') is recognised as being inadequate at present, while assessing the monetary value of ecosystem stocks is more or less impossible ([Ian Bateman](#), communicated to [David Rogers](#)). Yet the resulting monetary assessments may be used to trade away environmental for economic assets with a greater yield, for example a factory in a water meadow.

The natural environment is our vital life support system, and it is a dangerous delusion to imagine that it can be rendered easily into any economic framework, let alone the pre Dasgupta framework that gives GDP/GVA primacy over all other forms of stocks and yields.

Dasgupta defines wealth as the sum of natural, human and economic capitals and yields, and sustainability as the condition where this sum is either stable or increasing. Economic growth at the expense of natural capital and yields is therefore unsustainable.

We request that the Cambridge Local Plan adopts the Dasgupta definition of sustainability, i.e. definitely not the NPPF's false definition of 'sustainability', with the caveats mentioned above, especially the false or under-valuation of natural capital. This would provide a better starting point, and the Plan should be reworked in this context.

Carbon Emissions arising from Development

The Draft Local Plan does not follow a 'brownfield first' approach. It is therefore **not** consistent with national government policy as expressed repeatedly, recently by the Prime Minister.

Greenfield building maximises carbon emissions. The Local Plan should be encouraging Cambridge businesses to move north where there are up to 1 million empty homes and space for [1.3 million more on registered brownfield sites](#). Old airfields such as those being developed in Cambridgeshire are not true brownfields; only their disused run-ways and any associated buildings are and the former could be easily cleared and used as a source of recycled aggregate. Most of the former Bourn airfield is productive farmland.

The massive building and infrastructure programme contained in the Draft Local Plan breaches all obligations for sustainable development.

Embodied carbon emissions are ignored in the Plan. Cement manufacture contributes 8% of global carbon emissions which is more than three times the impact of aviation fuel. Iron and steel production accounts for another 8%. Between them they account for more emissions than the USA and are second only to China as greenhouse gas emitters.

According to the recent Cambridge and Peterborough Climate Commission report, at the present rate the Region will have used up all of its carbon budget, allocated to meet its legal obligation to reach zero carbon by 2050, **in less than six years**; due to the level of planned growth, emissions will accelerate further. The obvious conclusion is that all unsustainable growth has to be curbed.

The Climate Change Committee has argued in its 2018, 2019 and 2020 Annual Reports to Parliament that UK local and imported emissions arising from construction (the UK imports most of its building materials, even the bricks are made in Belgium or Holland), must be reduced if the UK is to meet its now legal emission targets.

No Plan for Integrated Public Transport

Climate change should be the single most important consideration in all aspects of transport planning and operation, and the Draft Local Plan fails to do this.

Indeed, the current local government structure in Cambridge and South Cambridgeshire with four different authorities claiming responsibility for some aspects of transport planning and delivery, coupled with the divided responsibility for rail infrastructure between Network Rail and East West Rail Company Ltd, is an impediment to any form of joined up thinking about transport.

Annual Reports to Parliament by the Climate Change Committee have consistently made the point that 'Surface Transport' is the greatest source of greenhouse gas emissions in the UK. Therefore, all transport planning should:

- (a) seek to minimise all forms of travel by discouraging commuting and leisure travel and encouraging use of digital communications,
- (b) where travel is essential, encourage active travel and/or use of public transport,
- (c) provide carbon efficient forms of public transport, particularly light rail and heavy rail on the most heavily used routes.

Road widening and road building proposals should be abandoned with immediate effect. The only consideration for any road layout changes, other than road safety, should be the question "Will it reduce net carbon emissions from construction and use?". Clearly, some small schemes which ease traffic flow will reduce emissions from acceleration, but those that increase road use will not.

Levelling Up

Major investment in the Cambridge area contradicts government policy to 'level up', even within Cambridgeshire.

Whilst it is true that some of the most affluent areas include some of the most deprived communities, it is disingenuous to claim that 'levelling up' should be about decreasing inequality within economically successful areas, at the expense of other regions of the country [where there is far more deprivation](#).

Re-using and upgrading the approximately 1 million empty homes, many of which are in deprived areas such as the former industrial towns and cities in the North, and building another 1.3 million homes on the registered brownfield sites across the country, will reduce carbon emissions from construction massively and speed up delivery - on average by around six months for brownfield sites according to [research by CPRE](#).

Democratic deficit in the process and evidence basis

Water Resources East have stated that their regional water plans align with the Government's plans for growth. Sewage in rivers and chalk streams is a matter of national concern, yet Water Resources East say that sewage is not part of their remit.

Meanwhile, the public consultation for the Draft Local Plan is taking place now, yet the consultation for the Regional Water Plan is not due until summer 2022. The public and councillors are forced to respond to Local Plan proposals with no idea whether, and if so, how, the water and sewage challenges can be resolved or what trade-offs have been proposed.

South Cambs. MP Anthony Browne has rightly expressed concerns about the Local Plan process and about water issues and transparency.

Water Resources East was established by Anglian Water which, is under investigation for sewage pollution. Anglian Water is also promised £227 millions of tax-payers' money to re-locate a fully functioning, recently modernised, sewage treatment plant into the Green Belt. This move is not for operational reasons, but to facilitate employment-led growth which requires taking the Green Belt from three medieval Cam Valley villages. This will be the subject of only a partial public inquiry because it has been submitted as a National Infrastructure project in order to minimise public scrutiny.

The Draft Local Plan has been prepared by the Greater Cambridge Shared Planning Service, but it appears to be inordinately influenced by the unelected Greater Cambridge Partnership which has business interests and ambitions represented on its board and but no counteracting residents' interests.

Much of the text of the Draft Local Plan appears to be consistent with announcements made by the self-appointed Arc Leaders Group promoting the so-called Ox-Cam Arc. This flawed concept has been criticised for lack of transparency or accountability right across the five affected counties and one county, Buckinghamshire, has withdrawn entirely from this completely undemocratic, self-selecting, body.

Conclusion

This is the wrong Plan at the wrong time. There are climate, biodiversity and water emergencies globally and locally. Local government should not be planning more economic and population growth in this area or more housing than current government targets require, but prioritising social housing and new water infrastructure to reduce stress on our rivers and wildlife. It should be supporting the national 'levelling up' policy. It should be consistent with the government's 'brownfield first' objective which will deliver badly needed homes faster. It should take into account the growing flood risk to large parts of the county and the consequences for national food supply. It needs to take into account the as yet, unknown, long-term effects on employment and travel behaviours of the COVID pandemic.

We request that this flawed Draft Local Plan is rejected, rewritten and re-submitted for full public consultation.

Kind regards,

[Steering Group of Friends of the Cam*](#)

Monica Bijok Hone

Wendy Blythe

Prof Tony Booth

Prof Susan Buckingham

Daniel Fulton

Jean Glasberg

Dr Alan James

Terry Macalister

Ian Ralls

Jane Williams

*Friends of the Cam is a cross-political-party group which holds well-attended events and activities aimed at raising public awareness of and involvement with, the problems facing the chalk river system that is the Cam-Ouse and tributaries. We seek solutions to the problems faced by our precious river systems. We are entirely independent of Councils, Water Companies or Business groups because we do not accept funding from any other organisation.