

**SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL**

**LOCAL PLAN EXAMINATION**

**Statement of Common Ground as agreed between:**

**1) Environment Agency**

**and**

**2) South Cambridgeshire District Council**

**In respect of:**

- **Chapter 4 of the South Cambridgeshire Proposed Submission Local Plan (July 2013)**

**and**

- **Matter SC2: Climate Change**

**Representations:**

- **59666 (Policy CC/1 and supporting text)**
- **59669 (Policy CC/4 and supporting text)**
- **59674 (Policy CC/7 and supporting text)**
- **59691 (Policy CC/9 and supporting text)**

**Date: 6 September 2016**

## **Purpose**

1. To identify areas of common ground, and remaining areas of disagreement, with regard to Matter SC2: Climate Change, in relation to the representations made by Environment Agency.

## **Background**

2. The Environment Agency submitted objections to Chapter 4 of the South Cambridgeshire Proposed Submission Local Plan (July 2013) relating to Policies CC/1, CC/4, CC/7 and CC/9.
3. South Cambridgeshire District Council proposed minor modifications to Policies CC/1, CC/4, CC/7 and CC/9 in response to the comments made by the Environment Agency and others. These modifications<sup>1</sup> were submitted to the Inspector alongside the South Cambridgeshire Local Plan in March 2014.

## **Areas of Common Ground**

4. The Environment Agency confirms that the proposed minor modifications have substantively addressed the comments made in their objections, and therefore they have no outstanding objections relating to these policies.

## **Policy CC/1: Mitigation and Adaptation to Climate Change**

5. The Environment Agency support Policy CC/1 and its justification which satisfies the National Planning Policy Framework in respect of the causes of climate change<sup>2</sup>.
6. The Environment Agency proposed that South Cambridgeshire District Council updated the Local Plan to include a summary of the effects of climate change and that these were included in the justification to ensure that developers are clear what effects to plan for. They also provided links to their published information on: 'Climate Ready' – a set of tools and information to help live with the changing climate; guidance on adaptation; and maps showing detailed climate change information for each river basin district.
7. South Cambridgeshire District Council has proposed a minor modification (MC/4/04)<sup>3</sup> to add an additional paragraph to the supporting text providing links to the Environment Agency's published information that may be useful to applicants in developing their proposals. The Environment Agency supports this modification, and this addresses its objections raised in the representation.

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<sup>1</sup> Schedule of Proposed Minor Changes to the South Cambridgeshire Proposed Submission Local Plan (March 2014) (RD/Sub/SC/040)

<sup>2</sup> Representation 59666 to South Cambridgeshire Proposed Submission Local Plan

<sup>3</sup> Schedule of Proposed Minor Changes to the South Cambridgeshire Proposed Submission Local Plan (March 2014) (RD/Sub/SC/040)

## **Policy CC/4: Sustainable Design and Construction**

8. The Environment Agency support Policy CC/4 as a water efficiency standard of 105 litres per person per day is necessary to ensure that South Cambridgeshire has sufficient water for the plan period and some resilience into the future with climate change and further growth<sup>4</sup>.
9. The Environment Agency proposed a change to paragraph 4.20 as there had been a change to the 'water stress' definition since the policy was published for public consultation. The change reflects a new national methodology for classifying water stress. Amend the first sentence of paragraph 4.20 to read: The Cambridge Water Company area is in an area of serious water stress as designated by the Environment Agency.
10. South Cambridgeshire District Council has proposed a minor modification (MC/4/06)<sup>5</sup> to paragraph 4.20 using the wording provided by the Environment Agency in order to reflect the updated methodology for classifying water stress. The Environment Agency supports this modification, and this addresses its objections raised in the representation.
11. Although the Environment Agency did not submit representations to the consultation on Proposed Modifications<sup>6</sup>, which proposed changes to Policy CC/4<sup>7</sup>, they support the proposed changes which set a requirement for new residential developments to meet the optional technical standard for water efficiency. The Environment Agency advises that the need for the 'optional' water efficiency standard to be applied is further justified by the Cambridge Area Water Cycle Strategy<sup>8</sup> and the need to prevent Water Framework Directive deterioration.

## **Policy CC/7: Water Quality**

12. The Environment Agency support Policy CC/7 and the evidence base that justifies it (specifically the Cambridge Area Water Cycle Strategy and the Anglian River Basin Management Plan)<sup>9</sup>. They also particularly support the water quality and river renaturalisation requirement as many of the watercourses in South Cambridgeshire are artificially modified and through vulnerable aquifers are susceptible to pollution.
13. The Environment Agency suggest that the policy should be modified so that only major development proposals are required to meet criterion 1a-1c to provide flexibility and allow the development management process to run smoothly.
14. South Cambridgeshire District Council consider that the policy can be applied as appropriate to the planning application being considered, depending on the scale and

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<sup>4</sup> Representation 59669 to South Cambridgeshire Proposed Submission Local Plan

<sup>5</sup> Schedule of Proposed Minor Changes to the South Cambridgeshire Proposed Submission Local Plan (March 2014) (RD/Sub/SC/040)

<sup>6</sup> Cambridge and South Cambridgeshire Modifications Consultation Report (November 2015) (RD/MC/010)

<sup>7</sup> South Cambridgeshire Local Plan Schedule of Proposed Modifications (March 2016) (RD/MC/150)

<sup>8</sup> RD/CC/080

<sup>9</sup> Representation 59674 to South Cambridgeshire Proposed Submission Local Plan

issues arising, and therefore modifications are not necessary. The Environment Agency agrees with this approach to the use of the policy, and this addresses its objections raised in the representation.

### **Policy CC/9: Managing Flood Risk**

15. The Environment Agency support the overall thrust of Policy CC/9, and in particular support criterion 1c and 1d which give clear priority to sustainable methods of surface water management, and the use of the 1 in 100 year plus climate change as a minimum design standard in criterion 1a<sup>10</sup>.
16. The Environment Agency suggest that some modifications are necessary to criterion 1a and 1b to make safety a clearer requirement when considering flood protection or mitigation measures, particularly given the nature of flood catchments in South Cambridgeshire. They propose adding 'to ensure safe occupation, access and egress' to the end of the first sentence of criterion 1b.
17. The Environment Agency also suggest that more detailed guidance, which could be provided in the form of a Supplementary Planning Document, is needed to support the effective implementation of the policy. They propose adding wording to paragraph 4.36 to outline that a Flood and Water Management Supplementary Planning Document will be produced.
18. South Cambridgeshire District Council has proposed minor modifications (MC/4/10 and MC/4/12)<sup>11</sup> to criterion 1b of the policy and paragraph 4.36 to reflect the suggestions made by the Environment Agency. The Environment Agency supports these modifications, and this addresses its objections raised in the representation.

### **Areas of Disagreement**

19. There are no outstanding areas of disagreement between the Environment Agency and South Cambridgeshire District Council with regard to Chapter 4 of the South Cambridgeshire Proposed Submission Local Plan (July 2013) and Matter SC2: Climate Change.

Signed: *Chris Swain*

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Chris Swain, Principal Planning Advisor, Environment Agency

Signed: *Caroline Hunt*

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Caroline Hunt, Planning Policy Manager, South Cambridgeshire District Council

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<sup>10</sup> Representation 59691 to South Cambridgeshire Proposed Submission Local Plan

<sup>11</sup> Schedule of Proposed Minor Changes to the South Cambridgeshire Proposed Submission Local Plan (March 2014) (RD/Sub/SC/040)