

Anglian Water Consultation Response

South Norfolk Village Cluster Housing Allocations Plan – Reg. 19 Consultation

1. Anglian Water

- 1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.
- 1.2. Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, above and beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

2. Anglian Water and Local Plans

- 2.1. Anglian Water is the statutory water and sewerage undertaker for South Norfolk district and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water has proactively engaged with the plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.

3. Commentary on the South Norfolk Village Cluster Housing Allocations Plan (VCHAP)

Introduction

- 3.1. Anglian Water recognises that the purpose of the VCHAP is to provide small scale sustainable growth in rural communities across South Norfolk, whilst the majority of growth under the strategic Greater Norwich Local Plan (GNLP) area is focussed in the main urban areas including the Broadland Growth Triangle, Norwich, the Cambridge-Norwich Tech Corridor and Key Service Centres. This approach more appropriately aligns with the need to provide a spatial strategy for growth which provides opportunities to minimise operational and embodied carbon to meet the Government's net zero emissions target by 2050.
- 3.2. We have proactively engaged with the Council and consultants regarding the preparation of the Water Cycle Study (WCS) to support the plan. Through our representation on the Publication version of the VCHAP we will positively respond with reference to previous communication in the plan-making process including specific comments regarding amendments to the WCS prior to the consultation; referring where necessary to these in our response. We would seek confirmation from the Council that these amendments to provide clarification to the WCS site

assessments will be accommodated to inform the submission version of the WCS as supporting evidence to the VCHAP.

- 3.3. As we have indicated to the Council through the evidence-led approach to the VCHAP, the rural nature of some of the settlements/village clusters in the plan mean that for some sites, it is unlikely it will be feasible/viable to connect to our sewer network due to the distance of some sites from our network; therefore, alternative options will need to be identified in these locations. In other locations there are very small water recycling centres (WRCs) with descriptive permits where growth may require significant infrastructure upgrades to accommodate additional foul drainage flows. As these very small WRCs only tend to serve a small proportion of properties within the settlement, the developer may need to consider alternative options such as package treatment plants subject to consultation with the Environment Agency and obtaining the necessary permits. A joint advice note on non-mains sewerage, developed with the Environment Agency, can be found on our website¹.
- 3.4. As the Plan intends to bring forward relatively small sites across rural communities in South Norfolk, we do not perceive a policy requirement for phasing delivery or headroom/capacity at our WRCs to be necessary. However, we actively endorse early engagement with us so we can assess the connection requirements of each development and its impact and implement any mitigation necessary.**
- 3.5. The information provided by Anglian Water is a snapshot of the current situation, which could change subject to publication of our final Drainage and Wastewater Management Plan (DWMP), new environmental legislation, and subsequent business plan requirements and investments to ensure that there is flexibility. Our final DWMP is due to be published at the end of May 2023. This is a collaborative long-term strategic plan highlighting the known and expected future risks to drainage and identifying solution strategies to mitigate these risks over the period 2025-2050.

Surface Water Management and SuDS

- 3.6. Anglian Water would welcome an overarching policy approach to managing surface water flows on site. For some sites, the clear intention is to ensure that a drainage strategy for the site will need to demonstrate that there will be no increase in surface water flood risk as a consequence of the development of the site. We would recommend that such measures are included within the policy or within an overarching policy, given the clear preference for managing surface water through the use of sustainable drainage systems (SuDS) in national policy and planning practice guidance. More recently the Government's intention to implement Schedule 3 of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England by 2024 is also indicative of prioritising appropriate surface water management in new development. The Schedule also makes the right to connect surface water run-off to public sewers conditional upon the drainage system being approved before construction can commence. However, until Schedule 3 is implemented **we would request that there is an**

¹ <https://www.anglianwater.co.uk/contentassets/ff314e5a2ec1452387d7aa04f6519c33/2020-11-10-aw-ea-non-mains-sewerage-advice-note---final.pdf>

appropriate policy requirement for managing surface water flows on site utilising sustainable drainage systems to provide a consistent approach.

Policy VC ASL1 – Land off Church Road

3.7. There has been recent experience through the Greater Norwich Local Plan (GNLP) examination where the Inspector has questioned the need for a policy requirement that requires wastewater infrastructure capacity confirmation prior to development taking place. Investment at our WRCs is linked to development coming forward with planning permission, so anything with a pre-commencement condition to evidence capacity of the receiving WRC could be problematic, particularly given the small-scale developments in the VCHAP. We suggest that appropriate policy wording is used to encourage developers to contact Anglian Water – similar to that in the GNLP submission version Policy 2 Sustainable Communities.

PROPOSED POLICY MODIFICATION:

~~A satisfactory foul water drainage strategy for the development prior to the commencement of development.~~ **Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network.**

Policy VC BB1 – Corner of Norwich Road and Bell Road

3.8. As raised in paragraph 3.4 above, Anglian Water suggests that due to the relatively small-scale nature of the sites, that the policy requirement regarding the capacity of the WRC is unnecessary. The draft DWMP has identified growth for the WRC catchment area to 2050 and has not included any medium or long-term strategies over this period. The policy requirement should be amended to reflect capacity within the network.

PROPOSED POLICY MODIFICATION:

Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network ~~regarding the capacity of the receiving water recycling centre and the need to phase the site until capacity is available.~~

Policy VC BUN1: Land to the north of Bunwell Street

Policy VC BUN2: Land opposite Lilac Farm, Bunwell Street

3.9. We support the policy requirement to engage with us as early as possible on connections to the vacuum sewer network in Bunwell. However, as raised previously, the small-scale nature of the proposed site should not require a need to determine the capacity of the receiving WRC. We therefore suggest the clause for both policies is amended as follows:

PROPOSED POLICY MODIFICATION:

Early engagement with Anglian Water to identify possible infrastructure crossing the site, **and** the capacity to connect to the current vacuum sewer system, **as well as the need to determine the capacity of the receiving Water Recycling Centre (WRC), and the consequent potential need to phase the site until capacity is available.**

Policy VC DIT1: Land at Thwaite's and Tunneys Lane

- 3.10. We can confirm that we have network assets crossing the site. The policy should remove the word 'possible' to provide certainty. Our draft DWMP states that the medium-term strategy to 2035 for Ditchingham WRC is transfer between catchments and using SuDS as part of a mixed strategy to address surface water flows into our networks. Given the scale of development we do not consider that there needs to be a policy requirement for phasing in relation to upgrades to the receiving WRC.

PROPOSED POLICY MODIFICATION:

Early engagement with Anglian Water (AW) to identify ~~possible~~ infrastructure crossing the site ~~and the need to phase the site for possible upgrades to the Ditchingham Water Recycling Centre;~~

Policy VC SWA2 Land on Main Road

- 3.11. This policy is an allocation brought forward from the 2015 Local Plan and therefore we consider that the policy text should recognise our feedback on allocation VC SWA1 where no such requirement is included regarding wastewater infrastructure capacity - as confirmed by the Water Cycle Study.

PROPOSED POLICY MODIFICATION:

~~Wastewater infrastructure capacity is confirmed prior to development taking place.~~

VC NEE1

- 3.12. We suggest that the supporting text and the policy is amended to provide clarity regarding the context of providing foul drainage to the site, given that it is not in close proximity to our WRC network, and other options such as package treatment plants are for the developer to consider and to obtain the necessary permit from the Environment Agency.

PROPOSED MODIFICATION TO THE SUPPORTING TEXT:

26.18 The site currently has no network connectivity to the sewer system, therefore early engagement with Anglian Water is recommended regarding the requisitioning of new connection or the developer to consider alternative on-site treatment subject to the necessary permits.

PROPOSED POLICY MODIFICATION:

Policy VC NEE1: Land north of High Road and east of Harmans Lane

Early engagement with Anglian Water regarding the requisitioning of new sewer connection or the developer to consider alternative on-site treatment.

Policy VC NEW1: Land off Alan Avenue

- 3.13. We propose that the wording of the policy requirement regarding liaison with Anglian Water is amended to reflect the need for early engagement but given the scale of development we do

not consider that there needs to be a policy requirement for phasing in relation to upgrades to the receiving WRC.

PROPOSED POLICY MODIFICATION:

~~Liaison with Anglian Water regarding foul water capacity and the potential need to phase the site to later in the plan period;~~ **Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network**

Policy VC NEW2: Land adjacent Alan Avenue

3.14. The supporting text has clarified that the application has been recommended for approval subject to the applicant being able to address nutrient neutrality. For the reasons stated above for Policy VC NEW1, and the application has been through the relevant consultation process, we suggest that the following clause can be removed.

PROPOSED POLICY MODIFICATION:

~~Liaison with Anglian Water regarding foul water capacity and the potential need to phase the site to later in the plan period;~~

Policy VC SEE1: West of Mill Lane

3.15. We support the clause regarding the need to address our infrastructure both within and close to the proposed allocation. We suggest that the wording of the clause is amended to address the need to engage with us regarding these matters and the requisitioning of a new sewer connection which should appropriately address the necessary matters for this site in terms of ensuring our own assets are protected and the necessary infrastructure requirements can be assessed.

PROPOSED POLICY MODIFICATION:

Early engagement with Anglian Water regarding their infrastructure on and adjoining the site and **connecting to the local water recycling network** ~~capacity of the Water Recycling Centre.~~

Policy VC SPO1: Land west of Bunwell Road

Policy VC SPO2: South of Station Road

3.16. Sites at Spooner Row: as the written justification and WCS suggest, there is limited capacity regarding future connections to our foul drainage network given that the existing WRC only serves a small number of properties in the settlement. The supporting text should emphasise that Spooner Row WRC is constrained due to the small number of properties it serves. Both policies should therefore reference early engagement with Anglian Water to address future connection requirements or the developer to consider alternative on-site treatment subject to the necessary permits.

PROPOSED MODIFICATION TO POLICIES VC SPO1 AND VCSPO2: to include the following criterion for consistency with similar site allocation policies where water recycling centres are particularly constrained.

Early engagement with Anglian Water regarding connecting to the local water recycling network.

Policy VC SPO4: Land at Chapel Road

3.17. For clarity and consistency, we would suggest that the wording in the policy is amended to refer to Anglian Water as the 'appropriate water authority' or sewerage undertaker.

PROPOSED MODIFICATION TO POLICY VC SPO4:

Advice is sought from ~~the appropriate water authority~~ **Anglian Water** regarding the need for relocation of the existing nearby sewage pumping station, to facilitate maintenance.

Policy VC TAC1: Land to the west of Norwich Road

Policy VC TAC2: Land adjacent The Fields

3.18. As raised in paragraph 3.4 above, Anglian Water suggests that due to the relatively small-scale nature of the sites, that the policy requirement regarding the capacity of the WRC and phasing of development is unnecessary. The draft DWMP has identified growth for the WRC catchment area to 2050 and has included medium-term strategy to increase capacity and a long-term strategy for a new permit. The policy requirement should be amended to reflect that strategies are in place to increase capacity within the network.

PROPOSED POLICY MODIFICATION:

Early engagement with Anglian Water ~~(AW) to ensure that there is adequate capacity, or capacity can be made available, in the local water recycling network to determine the capacity of the receiving water recycling centre (WRC) and the consequent potential need to phase the site until capacity is available.~~

Policy VC HAD1: Land south of Haddiscoe Manor Farm

3.19. Anglian Water suggests that due to the small-scale nature of the site, that the policy requirement regarding the capacity of the WRC and phasing of delivery is unnecessary, however early engagement is welcomed.

PROPOSED POLICY MODIFICATION:

Early engagement with Anglian Water regarding **connecting to the local water recycling network** ~~the capacity of the receiving WRC and the requisitioning to new sewers and any consequent need to phase the delivery of the site.~~

Policy VC BUR1: Land north of Staithe Road

3.20. For consistency we recommend that there is a similar approach in requiring early engagement with Anglian Water, as taken with other site allocations where there is a very small WRC serving only a small proportion of properties within a settlement.

PROPOSED MODIFICATION:

Early engagement with Anglian Water regarding connecting to the local water recycling network.

Policy VC WOO1: Land south of Church Road

- 3.21. Anglian Water suggests that due to the relatively small-scale nature of the sites, that the policy requirement regarding the capacity of the WRC is unnecessary. The draft DWMP has identified growth for the WRC catchment area to 2050 and has not included any medium or long-term strategies over this period. The policy requirement should be amended as suggested.

PROPOSED POLICY MODIFICATION:

Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the local water recycling network regarding the need to phase the site to address capacity issues with both the Water Recycling Centre and the local sewer network.

45. Wicklewood

- 3.22. Anglian Water agrees with the approach taken regarding the site allocation policies for Wicklewood where matters regarding cumulative/in-combination effects with the development identified in the GNLP may require the phasing of development beyond the early years of the plan, are addressed in the supporting text and therefore a policy requirement is not considered necessary.
- 3.23. **We suggest that the same approach is taken with other VCHAP allocations within WRC catchments that have in-combination effects with the GNLP developments, including sites within the catchment of Whitlingham WRC:**
- **Policy VC BAW1: Land east of Stocks Hill**
 - **Policy VC LM1: South of School Lane and East of Burnthouse Lane**
 - **Policy VC ROC1: Land south of New Inn Hill**
 - **Policy VC ROC2: South of The Street**
- 3.24. The small-scale nature of these allocations is unlikely to require phasing in respect of Whitlingham WRC and therefore the policy requirement can be removed.

Policy VC WIN1 – Land west of Hall Road

Policy VC WIN2: Land off Mill Road

- 3.25. For consistency we recommend that there is a similar approach in both policies requiring early engagement with Anglian Water, as taken with other site allocations where there is a very small WRC serving only a small proportion of properties within a settlement.

PROPOSED MODIFICATION TO POLICIES VC WIN1 AND VC WIN2: To include the following criterion in both policies:

Early engagement with Anglian Water regarding connecting to the local water recycling network.

4. Conclusion

- 4.1. Anglian Water is generally supportive of the VCHAP to guide small-scale development in rural settlements within the district. Although we have raised a number of proposed modifications to the policies in the VCHAP, these are considered to help provide clarity and consistency and ensure the Plan is effective as it proceeds to submission for examination. We would emphasise that a consistent policy approach to surface water management on all development sites is important to reduce the risk of run-off and minimising the risk of surface water intrusion into our foul drainage network.