

Anglian Water Consultation Response

South Norfolk Village Clusters Housing Allocation Plan

Reg. 18 Focussed Consultation

1. Anglian Water

1.1. Anglian Water is the water and water recycling provider for South Norfolk district/ Anglian Water has engaged with the Council in the preparation of the Water Cycle Study and responded to previous consultations on the Village Clusters and Housing Allocations Plan.

2. Commentary on the SNVCHAP consultation

2.1. Anglian Water recognises that the purpose of the VCHAP is to provide small scale sustainable growth in rural communities across South Norfolk. As indicated by our Reg.19 consultation response, the information provided by Anglian Water is a snapshot of the current situation, which could change subject to a number of factors, including the final determination of our PR24 business plan investments.

This consultation asks three key questions:

How big should the buffer be above 1,200 dwellings to ensure that this minimum number is delivered between now and 2038.

Anglian Water has no specific comments regarding the appropriate buffer to be accorded to the housing target. However, we would suggest that increasing the buffer should be aligned with suitable locations where there is sufficient headroom at our water recycling centres (WRCs) to accommodate future growth. This avoids the attendant operational and capital carbon impacts associated with providing further capacity at small WRCs, including pumping away to other catchments. In our Reg. 19 response we indicated that the Plan intends to bring forward relatively small sites across rural communities in South Norfolk, and that we did not perceive a policy requirement for phasing delivery or headroom/capacity at our WRCs to be necessary. Whilst we continue to actively endorse early engagement with Anglian Water, so we can assess the connection requirements of each development and its impact and implement any mitigation necessary; increasing the number of dwellings in certain settlements through additional site allocations could in some circumstances exceed available headroom at the receiving WRC. This may lead to delays in delivery if further investment is required.

Are the sites detailed in sections 1 to 11 suitable for allocation?

Is there anything specific that should be taken into account when developing any of these sites, and which could form criteria in a site-specific policy for the site, if it is allocated?

Site Name	No. Of dwellings	Anglian Water Commentary
SN0433, Land south of Wheel Road, Alington	12	<p>No objection to this site. Adjacent to water supply and foul drainage networks. Sewer within the site boundary. The applicant is advised to engage with Anglian Water to ensure suitable measures are undertaken so that our asset can be repaired and maintained.</p> <p><u>“Early engagement with Anglian Water to identify infrastructure crossing the site.”</u></p>
SN6000, Land north of Chapel Street, Barford	30	<p>No objection to this site. Adjacent to water supply and foul drainage networks. There is current capacity at Barford Chapel Street WRC for small scale growth – however, this may be impacted by cumulative growth from other commitments including proposed allocations VC BAR1/SNO552REVC across Colton and Barford within the WRC catchment. Suggest a policy requirement is included in the policy:</p> <p><u>“Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network.”</u></p>
SN0552REVC, Land at Watton Road, Barford	20	<p>No objection to this site. Adjacent to water supply and foul drainage networks. There is current capacity at Barford Chapel Street WRC for small scale growth – however, this may be impacted by cumulative growth from other commitments including proposed allocations VC BAR1/SN6000 across Colton and Barford within the WRC catchment. Suggest a policy requirement is included in the policy:</p> <p><u>“Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network.”</u></p>
SN0055, Land east of Spur Road and south of Norwich Road, Barnham Broom	15	<p>No objection to this site. Adjacent to water supply and foul drainage networks. There is current capacity at Barnham Broom WRC for small scale growth – however, this may be impacted by cumulative growth from other commitments including the existing proposed allocation VC BB1 within the WRC catchment. Suggest a policy requirement is included in the policy:</p> <p><u>“Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network.”</u></p>
VC BAW1 REV, Land to the east of Stocks Hill, Bawburgh	35	No objection to this site.
SN4020, Land west of Old Yarmouth Road, Broome	12	Based on current information, there is capacity at Ditchingham WRC for small scale growth – however, this may be impacted by cumulative growth from other commitments

Site Name	No. Of dwellings	Anglian Water Commentary
		<p>including the revised proposed allocation VC DIT1 REV within the WRC catchment.</p> <p>We suggest the policy is amended to state: <u>Early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network.</u></p>
VC DIT1 REV, Land at Thwaite Road and Tunney's Lane, Ditchlingham	10	<p>It is noted that the site is proposed to be increased to accommodate an additional 10 dwellings to bring the site total to 45 dwellings. Based on current information, there is capacity at Ditchingham WRC for small scale growth – however, this may be impacted by cumulative growth from other commitments including the new proposed allocation SN4020 within the WRC catchment.</p> <p>In addition to our previous recommendations for policy wording we would suggest the policy is amended to state: <u>Early engagement with Anglian Water to identify infrastructure crossing the site and connection to the local water recycling network.</u></p>
SN0218REV, Land north of The Street, Earsham	25	<p>No objection. The site is close to existing water supply and sewerage networks, and there is sufficient headroom at Earsham-Bungay Rd WRC to accommodate additional development in Earsham.</p>
VC GIL1 REV, South of Geldeston Road and Daisy Way, Gillingham	5	<p>It is noted that the site is proposed to be increased to accommodate an additional 5 dwellings to bring the site total to 40 dwellings, and an outline planning application has been submitted for the site. We are also aware of the additional outline application (2022/1897) for residential development North of The Street in Gillingham. Our consultation response to both applications, states:</p> <p>“The foul drainage from this development is in the catchment of Beccles-Marsh Lane Water Recycling Centre, which currently does not have capacity to treat the flows the development site. Anglian Water are obligated to accept the foul flows from the development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission”.</p> <p>The Drainage and Wastewater Plan proposes a medium-term strategy to increase capacity at the WRC. Our PR24 Business Plan that was submitted to Ofwat in October 2023 reviewed all our WRCs against the current view of growth to understand whether they will be able to manage with the additional demand within the next AMP period. Where a risk has been identified we have used a tiered approach to solutions, aiming</p>

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		to manage the risk through no or low cost solutions where possible proposes investments. It should be noted that whether investments go ahead is dependent on Ofwat's approval to allow us the funding at the final determination due at the end of 2024.
VC SWA2, Land on Main Road, Swardeston	40	An increase to 40 dwellings from 30 dwellings proposed at Reg.19. Anglian Water has no objection to the increase in housing numbers on this site.
VC SPO1 REV, Land west of Bunwell Road, Spooner Row	35	An increase to 35 dwellings from 15 dwellings proposed at Reg. 19. As previously advised in our Reg. 19 representation, 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 with the remainder having private treatment plants/septic tanks. The supporting text should emphasise that Spooner Row WRC is constrained due to the small number of properties it serves. Any allocation 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.
VC TAC1 REV, Land to the west of Norwich Road, Tacolneston	25 (approx)	No objection. We note reference to the current planning application, which Anglian Water has provided a consultation response to indicate that capacity is available at Forncett-Forncett End WRC.
VC WIC1 REV, Land to the south of Wicklewood Primary School, Wicklewood	40	An increase in number of dwellings to 40 from 30 dwellings proposed at Reg. 19 Anglian Water agrees with the approach taken regarding the site allocation policies for Wicklewood in the Reg. 19 VCHAP 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, which is addressed in the supporting text and therefore a policy requirement is not considered necessary. There are assets owned by Anglian Water within or close to the development boundary that may affect the layout of the site. Anglian Water would welcome a policy criterion to state: <u>Early engagement with Anglian Water regarding their infrastructure on and adjoining the site.</u>

3. Conclusion

- 3.1. Anglian Water has considered the additional allocations proposed by the focussed consultation. Our preference would be to focus small scale growth in locations where there is sufficient capacity to accommodate growth without the need for additional investment at WRCs and the attendant operational and capital carbon impacts that solutions to treat additional flows will incur. Whilst there are a number of locations where we have sufficient capacity, there are other settlements where the capacity of the receiving WRC may be constrained by the cumulative impact of existing commitments and existing allocations. The respective policies should therefore ensure that early engagement is sought with Anglian Water with regard to sufficient capacity being available to accept future flows from residential development.