

Anglian Water Consultation Response

South Norfolk Village Clusters Housing Allocations Plan Addendum

Regulation 19 Consultation

1. Anglian Water and Local Plans

Anglian Water is the statutory water and sewerage undertaker for South Norfolk District Council and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water wants to proactively engage with the local 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.

2. Commentary on the SNVCHAP Regulation 19 Addendum

2.1. Anglian Water has engaged with the preparation of the SNVCHAP throughout the various iterations and provided data to inform the evidence base. We have the following comments on the Regulation 19 Addendum:

A2.1 - Anglian notes the statement regarding the Water Cycle Study. Further commentary is provided at the end of our response on this element of the evidence base.

VC BAR2 - NOT SOUND

The proposed additional site for 40 dwellings is within the catchment for Barford-Chapel Street Water Recycling Centre (WRC). Based on current data, whilst there is limited headroom based on dry weather flow at the WRC for future growth, there is currently capacity for the proposed growth (VC BAR1/BAR2).

To take account of cumulative growth in the catchment, including additional dwellings that might arise through windfall developments, we would welcome the supporting text to encourage the developer to undertake early pre-planning engagement with Anglian Water to discuss network connections and network/WRC capacity.

The policy should be amended to require a flood and drainage strategy to be submitted for the site, which should be supported by a recent pre-planning engagement assessment from Anglian Water.

Anglian Water supports the requirement to alleviate flood risk given the site is identified at the head of a significant surface water flow path. The opportunities for providing overall betterment for the existing community should not be underestimated given the more frequent storms and intense rainfall experienced over the autumn and winter months (2023-24). Reducing surface water run-off can also help prevent ingress to our sewer networks and reduce the probability of surcharge events. Our experience over the winter of 2023-24 leading to the period between October 2022 and March

2024 was the wettest 18 months since records began - causing us to revise our expectations of the pace and scale at which climate change will impact our networks.

VC BAW1REV: Land east of Stokes Hill - **SOUND**

2.10 Anglian Water notes the statement regarding potential phasing of this site beyond the early years of the Plan given that it is located within the catchment of Whitlingham WRC. Anglian Water has a proposed growth scheme to increase dry weather flow capacity at Whitlingham WRC within our PR24 Business Plan for delivery in AMP8 (2025-2030). However, this investment is subject to final determination of our Business Plan by our regulator, Ofwat, which is due in December 2024.

Whitlingham WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels (TAL) by 1st April 2030. An accelerated infrastructure delivery scheme will deliver the phosphate element of the upgrade to TAL by 31st March 2027. This will reduce the amount of nutrient mitigation required for developments occupied after these dates.

It is noted that the policy requirement for early engagement with Anglian Water has been removed from the policy and is only referred to in the text. However, we support the requirement for a drainage strategy in the policy – it should be clarified that this assessment should include details of both surface water and foul drainage and with details to be agreed with Anglian Water in addition to the Lead Local Flood Authority.

There are no sewers within the proposed site allocation.

Policy VC DIT1REV: Land at Thwaite's and Tunneys Lane - **SOUND**

Anglian Water supports the policy requirement for early engagement for development at this site. There is limited dry weather flow permit headroom at the WRC to accommodate future growth in the catchment. As a result, the increase in the number of dwellings on the site, together with VC BRM1 and any additional windfall development coming forward, may cumulatively result in insufficient headroom being available at the WRC. Ditchingham WRC does not have an identified growth scheme for AMP8 (2025-2030) in our PR24 Business Plan. Therefore, should a growth scheme be required it would not be delivered until beyond 2030, and development would need to be phased accordingly.

The additional area identified to increase capacity of the site, impacts on another sewer (surface water) crossing the site, in addition to the foul sewer and water main. The policy requirement is therefore essential to ensure the protection of our assets and that they are appropriately accommodated within the development layout design.

Policy VC BRM1: Land west of Old Yarmouth Road - **SOUND**

Anglian Water supports the policy requirement for early engagement for development at this site. There is limited dry weather flow permit headroom at the WRC to accommodate future growth in the catchment. As a result, this additional site, together with VC DIT1REV and any additional windfall development coming forward, may cumulatively result in insufficient headroom being available at the WRC. Ditchingham WRC does not have an identified growth scheme for AMP8 (2025-2030) in

our PR24 Business Plan. Therefore, should a growth scheme be required it would not be delivered until beyond 2030, and development would need to be phased accordingly.

Policy VC EAR2: Land north of The Street - **SOUND**

The site is on the edge of the Earsham-Bungay Road WRC. There is capacity for the proposed level of growth as there is sufficient dry weather flow headroom available at the WRC. The developer would need to engage with Anglian Water regarding connections for water supply and wastewater in the usual way.

We support the need for a site-specific flood risk assessment because of the identified groundwater flood risk. Groundwater flooding and elevated water table levels can inundate our underground infrastructure and result in sewer flooding and loss of service for some properties/communities in periods of prolonged/intensive rainfall. Unfortunately, there is a lack of legislation that governs this type of scenario (where high groundwater levels impact sewerage assets, but do not cause an 'above ground' flood), and so we have held multiple workshops and discussions with Norfolk Strategic Flood Alliance partner organisations, in particular the Environment Agency, about managing groundwater differently in the future. Ensuring that new development is resilient to all forms of flood risk is therefore critical, and flood risk is managed appropriately to minimise cumulative impacts including on our existing and new infrastructure networks.

Policy VC GIL1REV: South of Geldeston Road and Daisy Way - **SOUND**

5.14: Anglian Water welcomes reference to the limited capacity of the Beccles-Marsh Lane WRC and the need for early engagement to determine whether there is sufficient capacity in the network and receiving WRC. Beccles-Marsh Lane WRC has been identified for investment in a growth scheme to increase dry weather flow capacity in the PR24 Business Plan for AMP8 (2025-2030). Our Business Plan is subject to final determination by our regulator, Ofwat – this is expected in December 2024.

Policy VC SWA2REV: Land on Main Road - **SOUND**

The site is on the edge of the Swardeston Common WRC catchment. There is capacity for the proposed level of growth as there is sufficient dry weather flow headroom available at the WRC. The developer would need to engage with Anglian Water regarding connections for water supply and wastewater in the usual way. We have no objection to the removal of the policy requirement relating to wastewater capacity due to current capacity availability.

Swardeston Common WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels by 1st April 2030. This will reduce the amount of nutrient mitigation required for developments occupied after this date.

Policy VC ROC1: Land south of New Inn Hill - **SOUND**

Anglian Water notes the statement regarding potential phasing of this site beyond the early years of the Plan given that it is located within the catchment of Whitlingham WRC. Anglian Water has a proposed growth scheme to increase dry weather flow capacity at Whitlingham WRC within our PR24 Business Plan for delivery in AMP8 (2025-2030). However, this is subject to final determination our Business Plan by Ofwat, which is due in December 2024. Whitlingham WRC has been identified

as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels (TAL) by 1st April 2030. An accelerated infrastructure delivery scheme will deliver the phosphate upgrade to TAL by 31st March 2027. This will reduce the amount of nutrient mitigation required for developments occupied after these dates.

It is noted that the policy requirement for early engagement with Anglian Water has been removed from the policy and is only referred to in the text. We have no objection to the removal of this clause.

Policy VC SPO1REV: Land west of Bunwell Road - **SOUND**

Policy VC SPO2: South of Station Road - **SOUND**

Due to the very small WRC at School Lane Spooner Row that is subject to a descriptive permit, and the limited capacity of these small works to accommodate significant growth, we agree with the need for early engagement to assess the feasibility of a wastewater connection. See also our commentary on the Water Cycle Study.

Policy VC TAC1REV: Land to the west of Norwich Road - **SOUND**

Policy VC TAC2: Land adjacent The Fields - **SOUND**

We support the policy requirement for early engagement with Anglian Water. As already identified in our response to the planning application currently pending decision on this site, there is currently headroom available at Forncett-Forncett End WRC to accommodate wastewater flows from the site.

Forncett-Forncett End WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels by 1st April 2030. This will reduce the amount of nutrient mitigation required for developments occupied after this date.

VC TAS1REV

No comments.

Policy VC WIC1REV: Land to the south of Wicklewood Primary School - **SOUND**

We support the addition of the clause to ensure early engagement with Anglian Water regarding our infrastructure within the site.

Wyndham WRC has been identified as a nutrient significant plant and will require phosphate and nitrogen removal upgrades to technically achievable levels by 1st April 2030. This will reduce the amount of nutrient mitigation required for developments occupied after this date.

VC HAD1 – **NOT SOUND**

Anglian Water would seek to retain the text which refers to the “**capacity of the receiving WRC**”, because Haddiscoe-Mock Mile Terrace WRC is a ‘descriptive works’ that only serves a small number of properties in the settlement and has limited scope for accommodating additional growth. See commentary on the Water Cycle Study.

VC WIN1 - **NOT SOUND**

Anglian Water would request that the following text is inserted after the proposed clause “**and capacity of the receiving WRC**”, because Winfarthing Chapel Close WRC is a ‘descriptive works’ that only serves a small number of properties in the settlement (i.e. only Chapel Close) and is constrained in terms of its operating capacity and siting to accommodate further growth. See commentary on the Water Cycle Study.

VC WIN2 – NOT SOUND

Given the distance from our small network and WRC in Winfarthing which only serves a small number of properties to the north of the settlement in Chapel Close, it is unlikely that it would be feasible to connect to this site. The requirement for early engagement for Anglian Water is likely to serve no purpose, unless retained to confirm wastewater options with the developer.

3. Water Cycle Study (WCS)

- 3.1. The WCS sets out the parameters for assessing the headroom or capacity of Anglian Water’s water recycling centres to accommodate the growth proposed in the SNVCHAP. In Section 3.1.1 Wastewater treatment assessment approach, and the sub-heading ‘Environmental Capacity Assessment’ there is a statement regarding WRCs with descriptive consents. A general parameter of whether allocated growth would exceed a population of 250 was used to determine whether environmental capacity would be impacted.
- 3.2. It is correct that many descriptive permits require a population equivalent of less than 250. Descriptive permits apply to small water recycling centres (WRCs) serving a small number of properties or a small settlement – often collectively referred to as ‘descriptive works’. These descriptive permits are for a low-risk discharge which does not contain any numerical limit conditions for the discharge but relies on descriptive conditions only – meaning there is no requirement for flow measurement at these sites. A descriptive permit generally applies when the WRC serves a population equivalent (PE) less than 250, with no trade effluent accepted at the works, and no potable water supply intakes downstream that are likely to be adversely affected. The Environment Agency (EA) will also assess whether there is any significant environmental or amenity impact before they grant a descriptive permit.
- 3.3. However, when looking in detail at the parameters of the permits many of the descriptive works are based on different descriptive standards that can apply to a much smaller population or cubic metres per day of flow that can restrict the capacity available. The descriptive permits for the following WRCs have a specification for a volume discharge which would equate to populations much lower than 250 and limits the feasibility of connections for proposed growth in these locations:

School Lane Spooner Row WRC - 17.65 cubic metres per day,

Haddiscoe-Mock Mile Terr WRC - 14.9 cubic metres per day,

Winfarthing - Chapel Close WRC - 10 cubic metres per day.

- 3.4. It is noted that a number of WRCs in Appendix B are identified as exceeding headroom capacity once growth from the Greater Norwich Local Plan and SNVCHAP are factored in. Some of these



have sufficient capacity for growth coming forward and will require subsequent growth investment in later AMPs, whereas WRCs such as Whitlingham and Beccles have already been identified for growth schemes to increase dry weather flow capacity in AMP8 (subject to final determination of our PR24 Business Plan by Ofwat at the end of 2024).

4. Conclusion

- 4.1. Anglian Water welcomes the further opportunity to engage with the plan preparation and will continue to liaise with the Council to support the plan and the relevant evidence base documents towards submission.