HS100

Chelmsford Local Plan Examination

MATTER 10: PROTECTING IMPORTANT ASSETS

Anglian Water Written Statement

Issue 3 – Is the approach to the protection and enhancement of the natural environment and biodiversity justified, effective and consistent with national policy?

Strategic Policy S4 – Conserving and enhancing the natural environment

10.12 In the third paragraph of Strategic Policy S4, is the requirement for developers to demonstrate that sufficient waste water treatment capacity is available ahead of occupation, justified and practical in all circumstances? Does this wording allow for situations where additional capacity would need to be made available to facilitate new development?

Anglian Water is supportive of the policy wording to ensure that sufficient wastewater treatment capacity is available ahead of occupation, which is further reinforced by policy requirements for wastewater infrastructure in Strategic Policy S9 – Infrastructure Requirements, and relevant site allocations policies where the Stage 2 Water Cycle Study (CC003) and Water Cycle Study Addendum (CC017) has identified wastewater capacity constraints.

As identified, in our written representations to Matter 6 questions v. z. and dd. – where sites are within South Woodham Ferrers WRC catchment for example, we would recommend a pre-occupancy condition to ensure that development is not occupied until the identified AMP8 (2025-2030) growth scheme at the WRC has been delivered. This is to ensure the necessary upgrades are in place to receive and treat flows in accordance with an updated permit for the site to avoid environmental harm. Where we have no capacity to accommodate further wastewater flows, and no growth scheme has been identified for delivery, then our position would be to object to development proposals, but exceptions would apply to strategic sites. Regarding the local plan's spatial distribution of growth and delivery trajectory, where there is no capacity at our WRCs, we generally suggest that growth is phased for delivery later in the housing trajectory to allow for future infrastructure investment to come forward in subsequent asset management periods (AMPs).

Earlier this year, we shared our Strategic Sites Guidance Note with local planning authorities. We recognise that strategic sites, identified as 500+ homes, in locations where there is more limited existing capacity at our water recycling centres and within our wastewater networks, remain sustainable in wider planning terms and important contributors to housing need. Therefore, these strategic sites may appropriately come forward over a longer time horizon as infrastructure investment is identified and delivered over subsequent AMPs.

In such cases, a phased approach to strategic sites allocated in a Local Plan would enable us to plan and deliver any required infrastructure investment in a timely and coordinated manner, ensuring our existing customers and the environment are protected. Given the scale of these sites, we fully appreciate that the build-out of strategic sites will occur over an extended period, with phased connections to the wastewater network. It is recognised that delivery of strategic sites could span several asset management periods (AMPs - five-year investment cycles), allowing development trajectories to inform future business planning and investment strategies. Anglian Water is, therefore, supportive of the principle of development at sustainable locations. However, to ensure that connections are appropriately phased and environmentally robust, we will recommend that appropriate planning conditions are imposed, so development is phased with in step with delivery of the required sewerage/drainage infrastructure.

Anglian Water would also expect a robust strategy for integrated water management on strategic sites to ensure that the most efficient use of water resources can be facilitated through the reuse of surface water run-off attenuated by SuDS and/or grey water reuse, to help reduce the volume of wastewater flows.

Future investment in wastewater and drainage infrastructure is informed by our Drainage and Wastewater Management Plan (DWMP). The Environment Act 2021 has made the preparation of DWMPs by water and sewerage companies a statutory requirement, and our next DWMP, due to be published in 2028 for the period 2030-2055, will be prepared under updated guidance published in May 2025. This must set out how we will manage and develop our drainage and sewerage systems to meet our obligations under Water Industry Act 1991and address challenges such as asset health, climate change and population growth. Using this information, we will conduct a risk assessment for three different timescales: the short- (5yr), medium- (15yr) and long-(25yr +) term. The outputs from these allow us to develop ‘best value’ investment solutions to meet our obligations in subsequent Price Reviews.

Anglian Water understands that there are nuances in the approach to wastewater infrastructure capacity, particularly in relation to our approach on WRCs where we have identified growth schemes, or where WRC capacity is limited and there are proposals for strategic sites coming forward. Recent emerging local plans have incorporated wording to provide wider flexibility in terms of future infrastructure investment, whilst ensuring water quality is protected. An example is the Greater Cambridge Local Plan (Proposed Submission) Policy CC/IW: Integrated water management, sustainable drainage and water quality that states:

6. To protect and enhance water quality, all development proposals must demonstrate that:

a. There is capacity for wastewater treatment and adequate wastewater conveyancing infrastructure to serve the whole development, or an agreement is in place with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development (where development is being phased, this must be demonstrated for each phase before first occupation);

Whilst we recognise this policy has not been tested at examination, we consider this might provide an example of suitable wording to ensure wastewater infrastructure capacity can be demonstrated, including circumstances where wastewater capacity can be made available in time to serve the development.