Chelmsford Local Plan Examination

MATTER 8: CREATING SUSTAINABLE DEVELOPMENT

Anglian Water Written Statement

Issue 1 – Does the plan set out positively prepared policies relating to climate change and flood risk which are justified, effective and consistent with national policy?

8.7 In Part A of Policy DM25, is the requirement for all new dwellings to achieve a water efficiency standard of 90 litres/person/day justified and supported by evidence? Should it also apply to changes of use to dwellings?

Anglian Water is fully supportive of this policy requirement to include tighter water efficiency standards in the Local Plan. This is evidenced through the Shared Standards for Water Efficiency in Local Plans (published in June 2025) which is referenced and justified in the Water Cycle Study Addendum (CC017). The East of England is seriously water stressed, and the Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery.

Whilst Anglian Water is not the water supplier for the Chelmsford City Council administrative area, as a partner to the Shared Standards, and the statutory sewerage undertaker, there are wider benefits for tighter water efficiency standards as this would also help reduce the operational and capital carbon required to deliver wastewater infrastructure upgrades, and to pump and treat wastewater flows from new development - assisting with future wastewater capacity. As referenced in our response to Matter 10, our approach phasing wastewater infrastructure to strategic sites is dependent on 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.

A policy for tighter water efficiency standards (of 90 l/p/d) has been successfully found to be sound at examination and adopted in the Uttlesford Local Plan.

8.10 Do Strategic Policy S2 and Policy DM18 provide an appropriate framework for dealing with the potential impacts of development on flood risk in all circumstances? Is it justified and consistent with national policy?

Anglian Water is generally supportive of the measures set out in Policy DM18 Flooding/SuDS. There is one outstanding matter in the SOCG019 Statement of Common Ground with Anglian Water March 2026 which is in reference to our request for Policy DM18 to require SuDS in all new development, as this is not explicit in the policy. In our Regulation 19 response we endorsed the recommendation of the Strategic Flood Risk Assessment (SFRA) Level 1 (CC001), which is also reiterated in the Water Cycle Study Stage 2 (CC003), to ensure sustainable drainage systems (SuDS) are incorporated in all new development proposals and not just for major development: The SFRA recommendation stated:

"*Developers should incorporate SuDS and provide details of adoption, ongoing maintenance and management on all development sites. Proposals will be required to provide reasoned justification for not using SuDS techniques, where ground conditions and other key factors show them to be technically feasible*".

We consider that the SFRA recommendation is consistent with the National Standards for Sustainable Drainage Systems (SuDS)[1] which does not specifically relate to major developments but "*are intended for application in the design of surface water drainage systems for new infrastructure and development, whether on greenfield or brownfield sites*".

Anglian Water requires a sustainable drainage (SuDS) first approach for managing surface water in new development proposals, demonstrating compliance with the surface water drainage hierarchy in accordance with the National SuDS Standards. Customers (developers/applicants) must clearly demonstrate that all higher-order drainage options have been fully explored before any connection to the public sewer is considered. It is the developer's responsibility to provide robust evidence confirming that the hierarchy has been followed and to demonstrate that alternative methods of discharge are not feasible.

[1] National standards for sustainable drainage systems (SuDS) - GOV.UK