

Norfolk Minerals and Waste Local Plan Examination

Written Statement Main Matter 8 – Waste Management

Issue 8 – Policy WP15

Policy WP15 – Is the requirement for a longer-term masterplan reasonable and necessary? Are the requirements of paragraph W15.4 also reasonable and necessary and, if so, how can the proposals contained within the paragraph be delivered?

Introduction

The requirement for a masterplan within Policy W15 Whitlingham Water Recycling Centre is an unresolved matter at the point of submission of the Norfolk Minerals and Waste Local Plan as recorded in the Statement of Common Ground between Anglian Water and Norfolk County Council [A19]. Anglian Water has met with Norfolk County Council (NCC) policy and development management planners to understand the need for this policy requirement and how it should be interpreted given the complexities and challenges it may present to Anglian Water in terms of the adaptive environment around future investment and delivery. Anglian Water raised objections via formal representation to the Reg.19 consultation regarding the content/detail of the masterplan requirement, and how it would be secured and implemented in practice [A4.1 – ref 99278 and 99280] – on the basis that the policy was not positively prepared or justified.

Anglian Water would like to take this opportunity to clarify that the outstanding matters detailed in the Statement of Common Ground [A19] are in relation to Policy W15 and paragraph W15.5 of the supporting text – and not paragraph W15.4.

Context

Whitlingham is the most significant water recycling centre (WRC) in Norfolk in terms of the population it serves, namely Norwich and the surrounding area, and one of only two sludge treatment centres (STC) in the county – with the second STC at King’s Lynn. The concerns raised by the Council relate to having a wider and more coherent overview of the site and its functions, and how these are planned to change within the Asset Management Period (AMP), when planning applications are submitted there is a clear link to how it fits with the wider growth strategy. Given the five-year business planning or price review period that water companies are required to go through, it was considered that the masterplan should align with this five-year period – e.g. 2025-2030 for AMP8.

Anglian Water’s PR24 Business Plan

Anglian Water’s PR24 Business Plan was submitted to Ofwat in Autumn 2023 and final determination is likely to be issued in December 2024. The business plan essentially involves two types of investment:

1. **Obligations** – environmental obligations such as spill reductions from storm overflows and nutrient removal from wastewater. As obligations these must be delivered to stated deadlines agreed with the regulator.
2. **Adaptive investment programme** – includes measures to address growth, ongoing maintenance and flood risk. Large investment schemes have more certainty, but there will be various investment decisions that will be based on a number of factors including asset condition and deterioration, emergency situations, industry emissions, and emerging legislation. Some investment schemes will be combined to deliver more effective and efficient outcomes and therefore a high level of flexibility is required. Solutions can change and evolve over the five-year AMP period including from a regulatory position, and we regularly review our investment plan to ensure we are flexible enough to adapt to change and deliver the most beneficial improvements. Investments could also be reprioritised to allow more urgent schemes to be delivered.

Investments – Decision Making Process

Long-term planning over multiple AMPs and agility in delivery are essential for Anglian Water to continue to adapt to a challenging environment including factors such as: impacts of climate change and extreme weather, regulatory demands, population growth, and changing markets driven by global uncertainty. Our investment decision-making process is a structured framework to help deliver projects in an appropriate and consistent way as illustrated by Figure 1.

Many of the investments proposed in the PR24 Business Plan for AMP8 (subject to final determination by Ofwat) are currently at the long-term planning stage and will not have progressed to a Decision Milestone (DM). It should be noted that there is no certainty on final designs of a project to support a planning application (if not permitted development) until a project is progressing towards DM3 with detailed designs. Timescales will be dependent on a number of factors including legislative requirements, complexity, and business prioritisation.

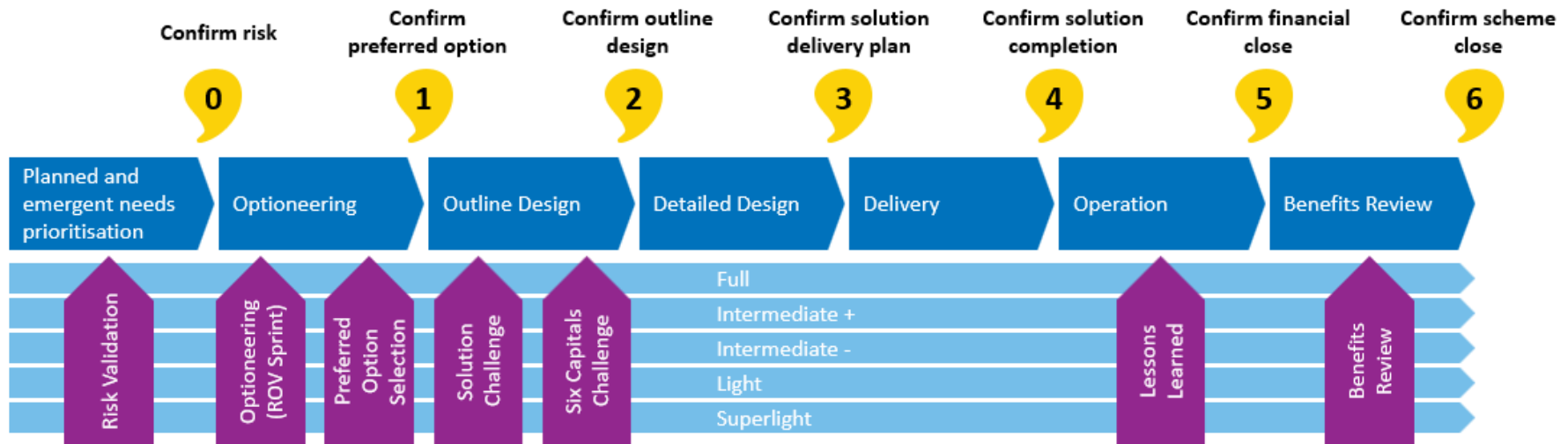


Figure 1: Decision Milestones 0-6 and associated deliverables

Masterplan Interpretation

It is suggested that the role and content of the masterplan should be clarified in the emerging Minerals and Waste Local Plan supporting text (paragraph W15.5), so that it is clear in setting the expectations and framework for the masterplan when preparing it as part of the submission of future planning applications - whilst acknowledging that some development will be permitted development under the General Permitted Development Order 2015 (as amended). It is also clear that the reinstatement of the Local Liaison Group for Whitlingham WRC would provide an appropriate platform for discussions on forthcoming developments more broadly with the Council and other stakeholders in an open and transparent way, including any changes to proposed investments at the site.

Anglian Water considers that the supporting text should summarise the role/purpose of the masterplan as follows:

The masterplan should be interpreted as a “medium-term strategy” that provides information regarding the site Whitlingham water recycling and sludge treatment centre, for a five-year AMP period – the scope of the masterplan will include:

- a) The context of Whitlingham WRC/STC – current role and function of the site as a water recycling and sludge treatment centre
- b) Environmental obligations that are required - setting out where built development that may require planning permission is likely to be required, if known at the time
- c) The scope of future investments in the AMP period in broad terms noting the dynamic environment of these investments with the potential for change and scope for flexibility - setting out where built development that may require planning permission is likely to be required, if known at the time

Because of the dynamic and adaptive nature of Anglian Water investments and the need for scope and flexibility for change, the masterplan **is not** intended to be interpreted as a masterplan in the established sense for site allocations (generally for strategic residential, employment or mixed-use developments) that supports outline development proposals by setting out the detailed scope, location and design of forthcoming development with contextual site plans.

How the masterplan will be used

Planning applications submitted for development proposals at Whitlingham WRC will explain how the proposed development aligns with the masterplan (medium term strategy) and the re-establishment of the Local Liaison Group meetings will be used to provide updates to stakeholders and discuss any forthcoming developments or potential changes identified through investment decisions, to design, delivery and implementation.

It is considered this dual approach is a workable solution that will benefit both decision makers and stakeholders and will ensure that delivery of future investments at Whitlingham WRC are discussed in an open and transparent way.

Indicative Masterplan Content Proposition for Whitlingham WRC

- A map of the existing site with explanatory text on the role and function of the site
- A high-level summary of planning history at the WRC

Summary of Obligations¹

- Obligation - Additional Digestion Capacity. This is a modification of the (CAMBI) thermal hydrolysis plant and the construction of an additional 3810m³ capacity digester plus ancillaries to increase the design capacity of the STC. Completion planned for 2025.
- Obligation - Whitlingham WRC UMON4 compliance with Flow to Full Treatment as part of WINEP (Water Industry National Environmental Programme). This Investment is to cover the complex liquor returns at the Whitlingham STC that require split out from existing return flows to remain compliant. Completion planned for 2025.
- Ofwat Accelerated Infrastructure Delivery final decision - to deliver phosphorous removal at three of the sites identified as discharging into Special Areas of Conservation (SAC) rivers. The sites include Whitlingham WRC on the River Yare (Norwich). All three sites are in a nutrient neutrality designated area and the population equivalent for all three sites are above the 2000 population equivalent threshold. By no later than 31st March 2027, Whitlingham should be commissioned and optimised to ensure the final effluent total phosphorus is compliant with the 0.25 mg/l permit. This will require a chemical dosing plant and ancillaries to be installed.

Potentially all these obligations will require planning consent.

High-level summary of the proposed PR24 Business Plan adaptive investment programme

Other investments proposed by the PR24 Business Plan (subject to final determination by Ofwat and the caveats previously alluded to) include works required to improve the processing, security and containment of sludge treatment; working to reduce process emissions; and developing gas to grid. Following final determination of the Business Plan, and when specific investments come forward through internal decision-making processes and milestones, these will be included in the masterplan with an indication of likely timescales and the built development required as part of the process where certainty can be provided or known options can be disclosed. The adaptive nature of our project and investment planning means that although we can provide high level summaries of proposed investments, we are unable to provide the level of detail until later in the process.

In addition, should further investments arise outside the Anglian Water Business Plan (e.g. from third parties or Anglian Venture Holdings - the investment and management vehicle

¹ For reference: this includes AMP7 (to 2025) and Accelerated Infrastructure Delivery obligations. Other AMP8 obligations will be confirmed following final determination of the PR24 Business Plan.

responsible for the Anglian Water Group's commercial businesses) that are closely related or bring added value to either the WRC or STC processes, outside of the regulatory business, these will be included in the masterplan at the appropriate time, and in discussion with the Local Liaison Group.

Drainage and Wastewater Management Plan (DWMP) strategies for Whitingham WRC and catchment 2025-2050

The Drainage and Wastewater Management Plan (DWMP) is a collaborative long-term strategic plan highlighting the known and forecasted future risks to drainage networks and water recycling centres and identifying solution strategies to mitigate these risks.

The DWMP provides the strategic backdrop to focus and prioritise solution strategies. However, it is a point in time view which does not consider the wider business need or context. It was therefore important for the PR24 Business Plan to review the short-term element of the DWMP against the other pressures to ensure that a deliverable, financeable and affordable Business Plan was prepared.

Longer term strategies identified in the DWMP will be reviewed in the next DWMP to take account of recent and subsequent legislative changes, growth in Local Plans, and against ambitions in the Anglian Water Long Term Delivery Strategy, which will be used to inform the PR29 Business Plan for 2030-2035.

- The DWMP process assessed Whitingham WRC to be at a high risk of having insufficient capacity for identified growth. In the medium term (2025 to 2035) proposals include network attenuation by creating storage in the sewer network to store additional flows.
- In the longer term (2050 strategy) 25% surface water removal across the catchment has been identified, by disconnecting surface water connections from the combined sewer network. Surface water sewers carry rainwater away from gutters, driveways, and roads. Instead of being directed to treatment at the WRC, surface water will be transported to an outfall to a watercourse. Potential longer-term options include a new WRC, or infiltration removal, new permit and side stream.

Conclusion

Given the reasoning stated in this paper regarding our investment planning processes, we cannot commit to a detailed longer-term masterplan and implementation strategy as proposed by Policy W15 and paragraph W15.5. However, Anglian Water can provide certain information that can be interpreted as a masterplan (medium-term strategy) in its broadest sense. This will help to provide an overview of future investment at Whitingham WRC and STC over a five-year AMP period to aid decision-making by the Council. It is considered that the masterplan would be most effectively reinforced by annual/bi-annual meetings of a re-established Local Liaison Group to enable Anglian Water to update the Council and key stakeholders on future proposals and any changes that may have arisen through the

investment planning process. The Local Liaison Group can therefore provide a helpful communication platform for future investments and obligations to be delivered at Whitlingham WRC and STC, including further detail relating to specific planning applications that are likely to come forward at the site as the development milestones are progressed for each project.