

Anglian Water Consultation Response

Norfolk Minerals and Waste Local Plan

Main Modifications Consultation

1. Anglian Water and Minerals and Waste Plans

- 1.1. Anglian Water is the statutory water and sewerage undertaker for the majority of Norfolk 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 Schedule of Proposed Main Modifications

- 2.1. Anglian Water has engaged with Norfolk County Council throughout the preparation of the Norfolk and Minerals Waste Plan, as documented in the Statement of Common Ground (SoCG) [A19] and our hearing statement for the examination [F28]. Our comments on the proposed main modifications are set out in the table below:

Main Modification	Anglian Water comments
MM21	Anglian Water supports the amendment to the policy to allow greater flexibility in how waste is managed at our sludge treatment centres. This represents the amendment agreed in the SoCG.
MM25	<p>Insert "and/or d. comply with new legislation and/or e. incorporate climate change adaption and mitigation measures (as detailed in Policy MW3)".</p> <p>Anglian Water supports the amendment to the policy to insert clause d. to address that future development proposals at our water recycling centres (WRCs) that may include climate change mitigation and adaptation measures to help meet our Net Zero Strategy commitments. This represents the amendment agreed in the SoCG.</p> <p>Insert the following new text before the last sentence in the policy: "Where appropriate, applications will also need to demonstrate the contribution that the development would make to water quality improvement".</p> <p>This additional clause did not form part of the agreed amendment specified in the SoCG for Policy WP14. Therefore, it does not clearly</p>

	<p>represent our previous submissions to the Local Plan consultation or examination.</p> <p>We consider that the additional new text before the last sentence in Policy WP14 is unnecessary as the need to demonstrate the contribution that the development would make to water quality is part of the regulatory permitting system that is overseen by the Environment Agency and includes legislative requirements. Therefore, we object to the insertion of this text as it is subject to a separate permitting system which includes environmental obligations through our Water Industry National Environment Programme (WINEP) to ensure we deliver our fair share of water quality objectives.</p>
MM26	<p>Anglian Water supports the modification which reflects the wording suggested in our hearing statement and aligns with our Business Plan and Asset Management Periods (AMP) of five years, that outline the investments being made during this period.</p> <p>A minor clarification – should the final paragraph of the modification text be sub-paragraph c)?</p>
MM27	<p>Anglian Water supports the modification to Paragraph W15.5 which reflects the wording suggested in our hearing statement and our internal decision-making processes that must be followed to deliver planned investments at Whitlingham WRC during the AMP.</p>
MM28	<p>Anglian Water supports the modification to Policy WP15 that appropriately clarifies the medium-term strategy for Whitlingham WRC – consistent with the interpretation of this strategy in MM27.</p>
MM50	<p>Anglian Water supports the modification to Policy MPSS1 requirement (i) to ensure appropriate measures are taken regarding the protection of our assets.</p>

- 2.2. It is noted that there are several proposed Additional Modifications (AM) to the plan which are minor in nature and do not materially affect the policies. However, they do provide factual corrections and clarifications to the interpretation of the policies.

Additional Modification	Anglian Water comments
AM26	Anglian Water supports the AM as requested and agreed in the SoCG.
AM34	Anglian Water supports the proposed AM to refer to water resources. Anglian Water is currently in the unfortunate position that it needs to limit new requests for non-domestic water (i.e. for manufacturing or processing) where it exceeds 20m ³ /day per site (this may be dependent on the availability of water in that area or where there is a cumulative impact from a number of smaller requests). This means that non-domestic water requests may be declined as these could compromise our regulatory priority of supplying existing and planned domestic

	<p>growth. Our non-domestic water requests policy is published on our website which explains our position in further detail.</p> <p>Developers that request greater volumes will need to complete a Water Resources Assessment as part of our planning process setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses.</p>
AM53	We support the clarification for the appropriate Policy application for WRCs in paragraph W3.6.
AM59	Anglian Water supports the AM and clarification on anaerobic digestion, as requested and agreed in the SoCG.
AM65	We welcome the clarification in this AM regarding permitted development rights, as requested and agreed in the SoCG.
AM66	Anglian Water agrees that the new paragraph relating to the Levelling Up and Regeneration Act is helpful to explain the additional infrastructure needs at the identified 'nutrient significant plants' or WRCs, to meet the relevant nutrient pollution standards (technically achievable limits for phosphorus and nitrogen).
AM67	Anglian Water supports the AM which provides an example of the investments we have committed to at Whitlingham WRC (as agreed through the SoCG).
AM68	We welcome this AM which reflects the agreed wording in the SoCG.
AM69	<p>We support the insertion of the suggested wording which has been agreed through the SoCG in respect of the Drainage and Wastewater Management Plan.</p> <p>However, we disagree with the Reason to "<i>clarify the timescale to be covered by the masterplan</i>" because, as evident by the main modifications, our Business Plan clarifies the timescale for the medium-term strategy – as a five-year period. The DWMP provides the high-level strategies for the WRC to 2035 and 2050.</p>

3. Fens Reservoir – Nationally Significant Infrastructure Project

- 3.1. As the Council will be aware, Anglian Water and Cambridge Water are progressing the Fens Reservoir through the RAPID gated process, recognising the need to plan long term for our region's future water needs. Fens Reservoir is a 55 million cubic metres (MCM) raw water reservoir, with a useable volume of 50 MCM, located to the north of Chatteris, with a useable volume of 50 MCM.
- 3.2. Anglian Water recently undertook a second stage non-statutory consultation on the Fens Reservoir. As the host authority for some of the associated infrastructure to bring water into the Anglian Water network – with a pipeline around Downham Market and service reservoir at



Bexwell – Norfolk County Council has indicated in their submission the Minerals and Waste implications. These include safeguarded mineral resources within the pipeline corridor and service reservoir polygon.

- 3.3. Anglian Water acknowledges that further investigation and assessment will be required through the DCO process to determine whether the construction of the associated infrastructure will result in the extraction of silica sand and carstone suitable for commercial use or reuse in the Project.
- 3.4. Following review of the main modifications, we do not consider that they present any additional constraints to the delivery of the Project that will help support sustainable growth in the region.

4. Conclusion

- 4.1. Anglian Water welcomes the opportunity to comment on the main modifications, which we generally support, given our engagement with the Council throughout the plan-making process.