

Local Plans

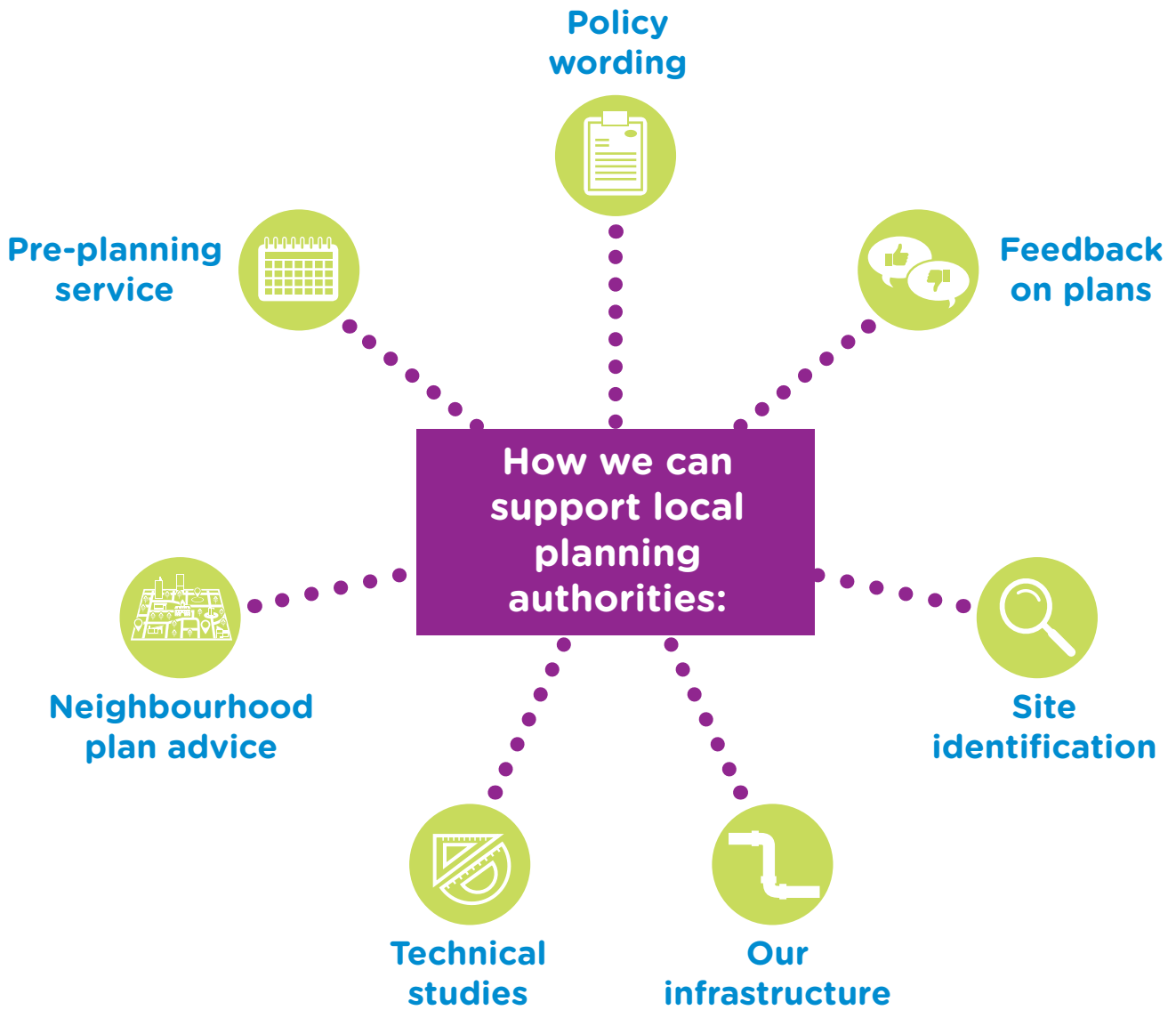
An Anglian Water perspective



Embedding water and resilience at the heart of growth

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Introduction

Anglian Water is the water and water recycling provider for over 6 million customers in the East of England and Hartlepool, encompassing the whole area south of the Humber estuary to the outskirts of London and around a fifth of the English coastline.

The East of England is the fastest growing region outside of the South East and well above the national average rate. Balancing this with the challenges we face from the impacts of climate change means improving collaboration, communication and innovation between delivery partners is crucial. As such, we want to support the preparation of Local Plans with local authorities to help deliver sustainable development.

This document sets out a vision for partnership working between local authorities and Anglian Water to deliver the economic growth and new housing the country needs, whilst also safeguarding the environment.

It includes the objectives we are seeking when responding to Local Plans and Mineral and Waste Plans, as well as some examples of suggested planning policy wording for authorities to consider or use which we would support. These policies have been taken from Local Plans and Mineral and Waste Plans from across our region. Not only do they have our full support, but they have been found sound by the Planning Inspectorate. Therefore, we hope these support our local authorities in developing their Local Plans.

This guide aims to inform Local Authorities on how Anglian Water can be involved in the plan preparation to ensure a smooth process for all stakeholders. It is our hope that through early, effective engagement, we can contribute to a more efficient and sustainable strategy regarding the shaping of Local Plans.

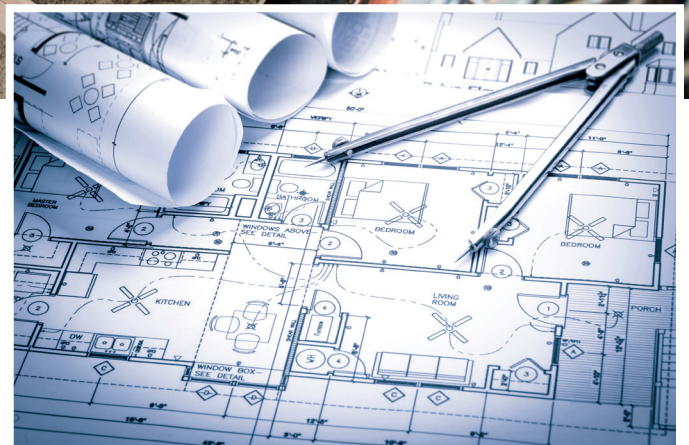
Why we want to support Local Plan preparation

Underpinning and delivering growth and development is a collaborative task, involving many stakeholders - local authorities, communities, regulators and infrastructure providers. This brings a number of challenges that we, as a region, must meet - now and in the future. These include:

- The region being the driest region in the UK, with just two thirds the average national rainfall. This could reduce with climate change, leading to lower available water resources. In fact, the Environment Agency classes the East as a region of serious water stress. Therefore, it is crucial we take action now to reduce demand and use water sustainably.
- Climate change leading to temperature rises, increased flood risk and rising sea levels - this particularly affects the East given the region is flat and low-lying, with a long coastline.
- Population growth the East of England is one of the fastest growing regions in the country, with a predicted 34% rise in the number of households by 2031. This puts enormous pressure on natural resources, including water, as well as water recycling and surface water infrastructure.

We are committed to make the East of England resilient to the risks of drought and flooding, and to enable sustainable economic and housing growth across the region. To help us achieve these, we want to be fully involved in the preparation of your Local Plans. Early engagement between local authorities and infrastructure providers is crucial to facilitating sustainable growth. As such, it is essential that we work closely with Local Authorities in order to understand what services we will need to provide, where, and when.





How we can help

Through this collaboration, we can advise on a number of areas. For example, we can offer assistance on policy wording to ensure that robust and effective policies are implemented. These policies help developers to understand requirements around water and water recycling infrastructure so they can shape developments at the earliest opportunity.

In addition, our guidance on site selection helps identify what infrastructure would be needed where, as well as how the development of a site would impact on existing infrastructure.

Furthermore, before Local Authorities begin consulting on supporting evidence for infrastructure, such as water cycle studies or infrastructure plans, we would like to be involved in identifying the scope of any technical evidence. Our business planning

process means that we often have evidence readily available to assist in Local Plan preparation, which can avoid the need for money, time and effort being duplicated. For example, we are using our Water Resource Management Plan and Water Recycling Long Term Plan to assist our investment decisions.

The wealth of information generated to inform these plans can also assist local authorities in their work too.

1. What we look for in Local Plans:

1.1 Water efficiency

Where Anglian Water is the water undertaker, the optional higher water efficiency target of 110 litres per person per day should be adopted in Local Plans. We would also actively encourage developments going beyond building regulations to further reduce the amount of water used.

Improved water efficiency should not be limited to measures within dwellings and commercial buildings, and a collaborative approach to promote innovation in water efficiency and re-use is required, working closely with water companies and site promoters/developers.

Why?

- The region that Anglian Water covers is an area where we need to give extra consideration to long term resilience and availability of water resources, meaning there is a need for long term water resilience through demand reduction.
- UK Government expects local planning authorities to adopt proactive strategies to adapt to climate change, taking into account water supply and demand considerations.
- Collaboration and early engagement means new developments can be planned to reduce vulnerability to the challenges a growing population places on water resources.



What could your policy say for residential development?

In areas where Anglian Water is the water undertaker, we suggest that the following wording is included in appropriate Local Plan policies, and secured through the imposition of planning conditions:

“Development proposals should demonstrate:

- *Dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in building regulations part G2.”*

This standard has been included in a number of adopted plans, including Policy LP14 of the Central Lincolnshire Local Plan (Lincoln City, North Kesteven and West Lindsey).

Where more than one water company serves an area, the local planning authority should contact the water company and consider specific wording for the respective boundaries. This is appropriate because despite close geographical proximity, areas may secure their water resources from outside the areas.

What could your policy say for commercial development?

Consideration to be given to the inclusion of a specific water efficiency BREEAM¹ standard for commercial development as part of the preparation of Local Plans.

What could your policy say for water neutrality?

“[Name of development(s)] must be water efficient and must aim to be water-neutral in areas of serious water stress by incorporating innovative water efficiency/re-use measures.”

¹ Building Research Establishment Environmental Assessment Method

1.2 Protect water resource assets

Water resource assets, such as reservoirs and boreholes, should be protected from inappropriate development in order to safeguard and ensure a resilient water supply.

Why?

- Inappropriate development can cause pollution by contaminating boreholes. In fact, the National Planning Policy Framework (NPPF) states that new and existing developments should not contribute to, be at unacceptable risk from, or be adversely affected by a range of unacceptable levels of pollutions, including water pollution.

What could your policy say?

“All new development must demonstrate:

- *That it has no adverse impact on the quality of water bodies and groundwater, or will prevent future attainment of good status.*
- *That development contributes positively to the water environment and its ecology and does not adversely affect surface and ground water quality;*

A Groundwater Risk Assessment will be needed to support a planning application where activities could directly or indirectly pollute groundwater.”

Central Bedfordshire have included this wording in Policy CC7 of their Local Plan.

1.3 Development near water recycling assets

Occupied land and buildings should be located an acceptable distance from water recycling assets such as Water Recycling Centres and pumping stations.

Why?

Development located within close proximity to water recycling infrastructure could lead to dwellings being affected by odour issues and traffic

movements from the operational site. Furthermore, it could impose additional constraints on the operation of Anglian Water’s assets.

- a. We want to be in a position to provide customers with the best service, and people living nearby our existing assets could compromise this.
- b. Mitigation is not always practical, and it may entail additional capital investment and higher operating costs.

What could your site specific allocation policy?

Pumping stations:

“The design layout should consider the proximity of the foul pumping station and allow for a distance of 15 metres from the boundary of the curtilage of the dwellings to reduce the risk of nuisance/loss of amenity associated with the operation of the pumping station.”

This wording has been included in Policy BAR 2 of the East Cambridgeshire Local Plan.

What could your site specific allocation policy say?

Water Recycling centres:

“Incorporate a scheme for the assessment of potential risk of odour associated with the nearby [add name] Water Recycling Centre (WRC) which shall demonstrate that an acceptable impact on the occupiers of the new dwellings is achieved without detriment to the ongoing operation of the WRC. As part of the scheme to be approved, a detailed masterplan will be submitted which demonstrates that occupied land and buildings within the site are at a suitable distance from the WRC to address potential risk of odour impact to a standard to be agreed by Anglian Water.”

1.4 Water supply and foul sewerage networks

It goes without saying, access to maintain and operate water supply and foul sewerage networks is of paramount importance to ensure we are able to provide our vital services. If there is a specific site allocation section in the Local Plan with individual site policies, a policy relating to accessible water supply and sewerage networks may be best placed in this section.

Why?

Water mains and sewers can be located within allocated sites and the site layout should be designed to take these into account. Not doing so can put our ability to provide water and sewerage services at risk.

What could your policy say?

That suitable access is maintained for water supply and drainage infrastructure.

What could you site specific allocation policy say?

“There is an existing sewer[s]/water main[s] (delete as appropriate) in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account.”

Suggested supporting text:

“This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewer/water main should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.”

This amended wording has been recommended by Anglian Water to Policy Site 3 in the Wellingborough Local Plan.



1.5 Evidence of available water and water recycling infrastructure

When submitting planning applications, sufficient evidence should be provided to demonstrate that water and water recycling infrastructure is available or can be provided in time to serve the development.

Why?

- This will encourage applicants to engage with Anglian Water at an early stage and ensure that sufficient evidence is provided as part of planning application submissions.
- To ensure new developments have access to the necessary infrastructure and to align any necessary upgrades. This will in turn ensure development takes place in a timely manner.

What could your policy say?

“Planning Permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development. Development proposals must consider all of the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.”

“Development proposals should demonstrate:

- *that water is available to support the proposed development;*
- *that adequate foul water treatment and disposal already exists or can be provided in time to serve the development.*

This wording has been adopted in Policy LP12 and LP14 the Central Lincolnshire Local Plan.

1.6 Appropriate phasing of development

Any new development should be phased appropriately to align with any required new or upgraded water and water recycling infrastructure provision.

Why?

Development can be proposed in advance of capacity being made available within existing infrastructure. It just makes it all the more important that we have the early conversation so we can make sure the right infrastructure is in place at the right time. Ultimately, we want to ensure our assets manage and underpin growth. Appropriate phasing of development means that we are able to deliver the necessary infrastructure on time to serve the development and enable further growth.

What could your policy say?

“Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased either spatially or in time to ensure the provision of infrastructure in a timely manner. Conditions or a planning obligation may be used to secure this phasing arrangement with the infrastructure provider.”

Policy LP12 the Central Lincolnshire Local Plan has included this wording.



What could your policy say?

“Development must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from the development. To achieve this:

- Development should seek to minimise increases in the demand for infrastructure and services, including measures to limit the need for additional/expanded water and waste infrastructure;*
- Planning permission will only be granted if it can be demonstrated that there is or will be sufficient infrastructure capacity provided within an agreed timescale to support and meet all the requirements arising from the proposed development;*
- The local planning authorities will work with developers and infrastructure/service providers to identify viable solutions to delivering infrastructure, where appropriate through phasing conditions, the use of interim measures and the provision of co-located facilities.”*

1.7 Local Green Spaces, Green Belt and Green Wedge designations

When considering the designation of land as Local Green Spaces, Green Wedges or Green Belt, water and water recycling assets should not be included in these designations.

Why?

- Anglian Water has a statutory obligation as a water and sewerage undertaker to provide water and water recycling services to our customers in our area of responsibility. Restrictive designations could result in an unintended barrier to water and water recycling operations and improvements.
- Within paragraph 156 of the NPPF, it states that ‘Local Plans should include strategic policies to deliver, inter alia, the provision of infrastructure for water and waste water.’
- Both Green Belt and Local Green Spaces are restrictive designations which limit the uses which can come forward within designated land. For example, waste uses are considered to be inappropriate in the designated Green Belt.

- Overall, we want to ensure the continued operation of existing water and water recycling assets so that we can provide the best service to our customers. If Anglian Water assets are included in restrictive designations, this could limit our ability to do this for our customers and communities.

1.8 Sustainable Drainage Systems (SuDS)

We favour a strong policy to ensure that Sustainable Drainage systems are included in the design of new developments, where appropriate, for Local Plans where Anglian Water is the sewerage undertaker.

By default, all surface water flows should be managed using sustainable drainage systems with a strong preference in favour of natural infiltration of rainwater into the ground. Rainwater entering our drains and sewers should be considered only as a last resort, and in all cases minimised as far as possible.

Why?

- The introduction of additional surface water flows to the public sewerage network increases the risk of sewer flooding for existing residents in the catchment.
- It reduces the need for hard infrastructure by creating green spaces which enhance amenity value for the community.
- The NPPF states that new developments should give priority to SuDS and that major developments should incorporate them unless there is clear evidence deeming them inappropriate.
- The NPPF also states that development should only be allowed in areas at risk of flooding where it can be demonstrated that the plan incorporated SuDS (unless there is clear evidence that this would be inappropriate).

What could your policy say?

“Through appropriate consultation and option appraisal, development proposals should demonstrate:

- That they have incorporated Sustainable Drainage Systems (SuDS) in to the proposals unless they can be shown to be impractical.”*

We have seen this wording adopted in Policy LP14 of the Central Lincolnshire Local Plan.

“All development that results in an increase in hard standing area or impacts on surface water flow paths must therefore:

- ***Design SuDS to deliver multiple environmental benefits, including flood risk and waste quality management, biodiversity and landscape enhancement, and improve amenity, access and open space.***

In exceptional circumstances, where a sustainable drainage system cannot be provided, it must be demonstrated that it is not possible to incorporate sustainable drainage systems, and an acceptable means of surface water disposal is provided at source which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation with a reduction in peak and total discharge.”

“The development shall consider the risk of flooding from ordinary watercourses and surface water and shall avoid vulnerable development in these areas accordingly. Subject to the findings of the site specific flood risk assessment the development shall deliver strategic measures to reduce flood risk including the use of sustainable drainage methods (SUDS) to attenuate and discharge surface water run-off at reduced rates, and at least at a rate no greater than if the site were undeveloped and to reduce existing downstream risk.”

We have seen this wording included in Policy CC5 of the Central Bedfordshire Local Plan.

1.9 Renewable Energy

Renewable energy generation is making up an increasingly large part of the UK’s energy mix. It also helps contribute to the circular economy, whilst offsetting carbon emissions, and this is particularly the case in the water industry.

While it may be a little known fact that we are a generator of renewable energy, it is something we actively want to pursue so that we are able to pass the benefits on to our customers. Therefore, we would like to see a flexible policy that will allow us to retain the option to generate renewable energy on Anglian Water land and assets.

Why?

- Generating renewable energy makes the most of the resources and operations. These efficiencies help us to keep customer bills down.
- By investing in renewable technologies, such as solar, the business and our customers are protected from energy price inflation, providing an extra level of certainty for our customers.
- Investment in renewable energy technologies also reduces Anglian Water’s reliance on the electricity grid. This significantly reduces carbon emissions and enhances the resilience of our operations.
- By making the most of our assets, generating renewable energy will help us meet our goal to be a carbon neutral business by 2050.



2. What we look for in Minerals and Waste Local Plans

2.1 Water Recycling Infrastructure

Secure positive reference in development plans to the continued operation and development of water recycling infrastructure being delivered by Anglian Water.

Why?

- To ensure that the development for water recycling infrastructure by Anglian Water is supported in principle in Waste Local Plans.
- We want to be an enabler of growth, and we therefore need supportive policies within the Waste Local Plan that allows us to develop and operate our water recycling infrastructure to allow us to serve our existing and future customers.
- Positive reference to the development of water recycling infrastructure in a Waste Local Plan will allow us to meet the demands of the council's wider growth proposals identified in the Development.

What could your policy say?

“Proposals for new water recycling capacity or required for operational efficiency, whether on existing sites or elsewhere; including the improvement or extension to existing works WRCs, supporting infrastructure (including renewable energy) or the co-location of WRCs with other waste management facilities; will be supported in principle, particularly where it is required to meet wider growth proposals identified in the Development Plan”.

This amended wording has been recommended for inclusion in Policy 12 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan.



2.2 Mineral Extraction and Water Resource assets

The location of mineral extraction and waste management proposals should consider their proximity to Anglian Water assets.

Why?

- Mineral allocations can include existing water and water recycling assets. These should be excluded from mineral working areas to ensure that these assets can continue to be operated by Anglian Water.

2.3 Mineral Extraction, Waste Management proposals and Water Resource assets

We want to see recognition of the need to protect water resource assets from inappropriate development.

Why?

- Activities, such as mineral extraction and some waste management uses, pose a risk to our water resource assets, as they can pollute groundwater sources and contaminate drinking water supplies.
- It is, therefore, essential that pollution to water resources is avoided. Therefore, mineral extraction and waste management proposals should not have an adverse impact on the continued operation of Anglian Water water resource assets.

What could your policy say?

Water resource assets

“Minerals and waste management development will only be permitted where it can be demonstrated that there would be no significant adverse impact on:

a. the quantity or quality of surface or groundwater resources; and

b. the quantity or quality of water abstraction currently enjoyed by abstractors unless acceptable alternative provision is made; and

c. the flow of groundwater at or in the vicinity of the site; and

d. increased flood risk, both on-site and off-site.

All proposed development will be required to incorporate adequate water pollution control and monitoring measures”.

This wording has been included in Policy 24 of the emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan.





3. How else we can support you:

3.1 Site allocation criteria

We are also interested in the being involved in the site allocation process. For example, we can advise local authorities on the extent to which water and water recycling infrastructure improvements may be required to serve the sites identified by councils, as well as whether the proposed development sites may have an impact on existing infrastructure (including water recycling centres, pumping stations, sewers, water mains, reservoirs and groundwater sources) owned by Anglian Water.

We believe that the available capacity of water and water recycling infrastructure should form part of the criteria that is used to determine which sites should be included in the Local Plan. This is because considering availability of water and water recycling infrastructure provision in the early stages of site allocation will make the process more efficient for local authorities, as any issues are identified earlier on.

Criteria to consider relating to Anglian Water's existing infrastructure:

- Developments should be located at an appropriate distance from water and water recycling assets to ensure that contamination and pollution are avoided, and that amenity loss does not arise. This includes mineral extractions sites that can pollute water sources such as boreholes, posing a risk to the drinking water supply.
- Availability of water and water recycling infrastructure to serve developments and the extent to which they should be phased, allowing for infrastructure to be provided in a timely fashion, ensuring that the capacity of water and water recycling infrastructure is available at the right time.
- Restrictive designations should not include existing Anglian Water assets. This is to ensure existing assets can continue to operate, serve customers and be maintained.

3.2 Working with you on plan preparation:

We want to be part of the preparation of Local Plans on an on-going basis, helping local authorities to reach ambitious, yet achievable, goals. Through engaging in a co-creation approach, we want to work collaboratively with local authorities and other stakeholders to help prepare plans in a way that works for everyone. This is why we want to be

involved at an early stage to help shape plans before they are submitted by aiding local authorities in understanding Anglian Water's objectives, and how these should be taken into account when preparing a Local Plan.

The government's Planning Practice Guidance states that plan makers should engage with a range of stakeholders, including infrastructure providers. Anglian Water are signatories to the Statements of Common Ground which will be prepared as part of the Local Plan process.

Early discussions are, therefore, important to help us understand what a local authority wants to achieve, and how we can plan for this growth as part of our business planning process, informing both the Local Plan and the associated evidence base.

We want to comment on the scope of further technical evidence prior to it being prepared or commissioned, particularly in relation to information we are able to provide. Examples of which include Water Cycle Studies/Strategies, Infrastructure Delivery Plans or Utility Studies etc.

We also actively encourage on-going dialogue relating to the timing of delivery on sites, including those identified in adopted and emerging Local Plans and Neighbourhood Plans.

3.3 Data Requirements

When we review Local Plans and fulfil our business planning, we need the appropriate data for us to be able to comment effectively. These data include:

- A GIS layer and shape file of the site, accompanied by the site reference that is consistent with the Local Plan or SHLAA.
- The floor space of retail sites in either hectares or square metres.

- The number of houses.
- The amount of land identified for employment purposes in hectares.
- Identified proposed site use – housing, employment, retail or mixed use.
- Timing of development where known.

Aligning data requirements enables a much swifter and effective system of data sharing between local authorities and ourselves. Ultimately, this will help speed up the overall delivery of growth.

3.4 Levels of Service

If it is a statutory Local Plan consultation, we will comment in accordance with the timescale - usually within 6 weeks.

If it is a non-statutory consultation, we require a minimum of 4 weeks to provide comments on a Local Plan. However, this timescale may be varied with the agreement of the council during busy periods when we have a significant number of other consultations.

3.5 Neighbourhood planning

Our Strategic Planning team will help support the preparation of Neighbourhood Plans by providing information on how we consider infrastructure capacity, how we manage the impact of development on our infrastructure, funding arrangements and information on historic operational issues where appropriate.

We have published a guidance note on Neighbourhood Planning which is available to view on our website. Where we serve the area, we recommend that District, Borough and Unitary Councils direct Parish and Town Councils that are preparing a Neighbourhood Plan to our guidance.

3.6 Planning Applications

We will provide comments on major planning applications of 10 or more dwellings or 0.5ha or more of employment land, and our Pre-Development team will respond to any concerns regarding specific planning applications. For a fee, our pre-development service will undertake a complete assessment of the implications of a site for Anglian Water's existing infrastructure, including modelling where necessary. This will identify the mitigation required within the foul sewerage network and/or water supply networks.

Our Pre-Development team can help you with enquiries regarding specific individual planning applications.

You can reach them at:
planningliasion@anglianwater.co.uk

- **Anglian Water Strategic Direction Statement**

Our 25-year Strategic Direction Statement sets out our vision from 2020-2045. It assesses the challenges we face and how we plan to overcome these, and sets out how we will deliver on the outcomes we have agreed for customers and the environment.

- **Water Resource Management Plan**

Our Water Resource Management Plan aims to ensure a sustainable and secure supply of water whilst also ensuring that we deliver the outcomes our customers want, reflecting the value that society places on the environment in the process.

- **Water Recycling Long Term Plan**

This Plan will improve our understanding of what is needed to protect this vital service from the risks of climate change, severe flooding and strategic growth, and will also set out several aims regarding water recycling.

- **Long Term Surface Water Management Plan**

Our Surface Water Management Plan will help us to manage growth and flood risk, reduce pollution and energy costs through reduced pumping and treatment of surface water, and deliver a flourishing environment.

- **Neighbourhood Planning Guide**

Our Neighbourhood Planning Guide outlines how we can work with Parish and Town Councils to prepare a neighbourhood plan.

**For more information on these publications, please email:
public.affairs@anglianwater.co.uk**



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