

GNLP response to draft Final Water Cycle Study Report (Jan 2021)

Recommendations

WW1 – Development and the Sewerage Network

It is recommended that Major Development sites assessed by AWS as part of the WCS as Amber or Red for wastewater network constraints should be subject to a pre-development enquiry with AWS at an early stage, and if possible before submitting a planning application, to inform the asset management plans prior to planning permission being granted. Assessments made within this WCS consider each site in isolation and network capacity will change depending on when and where sites come forward.

Response - As network capacity changes over time it would be appropriate for all major developments to undertake such pre-development enquiries. This would generally be for the benefit of the potential applicant and AWS and not a requirement of the development; however, where there are known capacity issues (eg as identified through the WCS) the planning authority will need to have it demonstrated that there is adequate capacity, or it can be made available, for a proposed development. The following has been added to Policy 2 Sustainable Communities:

“iv. Potential applicants for planning permission for major developments are advised to contact Anglian Water Services in the early stages of producing a development scheme in order to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network. The provision of capacity could affect the timing of development. In locations where there are known to be capacity issues the local authority will expect this engagement to have taken place and for it to be demonstrated that adequate capacity will be available to serve the development. (see Appendix 1 Infrastructure Requirements for currently known locations with capacity issues).”

And added to Appendix 1 Infrastructure Requirements under the Water section:

“The Water Cycle Study undertaken for the GNLP identified locations where there may be future capacity issues to be addressed for the growth proposed in the GNLP within the wastewater catchments of Aylsham, Foulsham, Long Stratton, Reepham, Rackheath, Diss, Ditchingham, Saxlingham, Whitlingham Trowse and Woodton. These issues should, at least in-part, be addressed by Anglian Water’s current Long Term Plan, but revisions may be necessary to this to fully address the GNLP proposals when finalised.”

WW2 – Development in the wastewater catchments of: Ditchingham, and Woodton

These WRC have limited current treatment capacity. It is recommended that the GNA authorities consider embedding a development control policy within the Local Plan to require that developers provide evidence to them that they have consulted with AWS regarding wastewater treatment capacity, and the outcome of this consultation, prior to development approval. The GNA authorities should consider the response from AWS when deciding if the expected timeframe for the development site in question is appropriate. It is recommended that any planning permission for Major Development proposed to drain to these WRCs up to 2025, is subject to consultation with and discharge of any conditions imposed by the

Environment Agency and AWS. Prior to development, both organisations should be satisfied that the development can be accommodated either within the limits of capacity at the WRC or by sufficient additional capacity being made available, and that the water quality requirements of the WFD will not be compromised. If necessary, a Grampian condition could be imposed by the respective local authority, prohibiting development authorised by the planning permission or other aspects linked to the planning permission (e.g. occupation of dwellings) until the provision of the necessary infrastructure to accept the additional flows.

Response - Addressed under WW1

WW3 – Development in the wastewater catchments of: Aylsham, Foulsham, Long Stratton, Reepham, Rackheath, Diss, Saxlingham Whitlingham Trowse and Woodton These WRCs are likely to require significant upgrades in AWS' next investment period (2025 onwards – AMP8). It is recommended that the GNA authorities consider embedding a development control policy within the Local Plan to require that developers provide evidence to them that they have consulted with AWS regarding wastewater treatment capacity, and the outcome of this consultation, prior to development approval. The GNA authorities should consider the response from AWS when deciding if the expected timeframe for the development site in question is appropriate. It is recommended that any planning permission for Major Development proposed to drain to these WRCs up to 2030, is subject to consultation with and discharge of any conditions imposed by the Environment Agency and AWS. Prior to development, both organisations should be satisfied that the development can be accommodated either within the limits of capacity at the WRC or by sufficient additional capacity being made available, and that the water quality requirements of the WFD will not be compromised. If necessary, a Grampian condition could be imposed by the respective local authority, prohibiting development authorised by the planning permission or other aspects linked to the planning permission (e.g. occupation of dwellings) until the provision of the necessary infrastructure to accept the additional flows.

Response - Addressed under WW1

WW4 – Development outside the three Districts It is recommended that communication with neighbouring local authorities, as part of the duty to co-operate, should continue to be pursued, to ensure that future WCS assessments closely represent the future growth scenarios at WRCs which discharge into the Waveney, Bure, Yare and Wensum (and their tributaries).

Response – Duty to co-operate discussions will continue.

WW5 - Treatment Capacity Review It is recommended that each Council continues to update AWS on future development phasing and changes to growth allocations to

ensure that plans for WRC upgrades in response to permit change requirements or flow capacity constraints take account of the most up to date planning position.

Response – dialogue currently takes place with AWS and will continue, and relevant information is provided through the authorities' Annual Monitoring Reports .

WS1 – Water Efficiency in New Homes and Buildings In order to move towards a more 'water neutral position' and to enhance sustainability of development coming forward, a policy should be developed that ensures all housing is as water efficient as possible including maximisation of water re-use, and that new housing development should go beyond mandatory Building Regulations requirements, with a minimum of the optional requirement of 110 l/h/d.

Response – This issue is addressed under Policy 2 Sustainable Communities and the related supporting text.

WS2 – Water Efficiency Retrofitting In order to move towards a more 'water neutral position' throughout the three Districts, GNA should seek to advocate the achievement of further water efficiency savings through their planning policies and development management, working with AWS to develop further options for retrofitting. This could be considered further through the preparation of the Local Plan. It is recommended that GNA adopts a facilitating role of encouraging private landlords, owner-occupiers and businesses to retrofit existing dwellings and non-domestic buildings with water efficient devices, where sufficient resources are available.

Response - This issue is addressed under Policy 2 Sustainable Communities and the related supporting text.

WS3 – Water Supply Demand Balance It is recommended that the GNA continues to update AWS on future development phasing and changes to growth allocations via the GNA authorities' Annual Monitoring Reports, to ensure the future supply-demand balance can be appropriately captured in the next asset planning period (AMP7).

Response – dialogue currently takes place with AWS and will continue, and relevant information is provided through the authorities' Annual Monitoring Reports.

SM1 – Sewer Separation

Developers should ensure foul and surface water from new development and redevelopment are kept separate where possible. Surface water should be discharged as high up the following hierarchy of drainage options as reasonably practicable, before a connection to the foul network is considered: · into the ground (infiltration); · to a surface waterbody; · to a surface water sewer or another drainage

system; · to a combined sewer. Where sites which are currently connected to combined sewers are redeveloped, the opportunity to disconnect surface water and highway drainage from combined sewers must be taken. This approach will also aid in improving capacity constraints at WRCs.

Response - This issue is addressed under Policy 2 Sustainable Communities and the related supporting text.

SM2 – Watercourse Discharge Controls Discharges of surface water to watercourses should provide pollution prevention control measures prior to discharge. The use of SuDS should be encouraged to provide water quality improvements.

Response - This issue is addressed under Policy 2 Sustainable Communities and the related supporting text.

SM3 – Surface Water Sewer Capacity The surface water and combined sewer systems in the study area are generally at capacity and it is therefore necessary for developers to implement SuDS systems to reduce runoff rates to as close to greenfield runoff as possible and achieve greenfield rates for all undeveloped sites.

Response - This issue is addressed under Policy 2 Sustainable Communities and the related supporting text.

ECO1 – Biodiversity Enhancement It is recommended that the GNA include a policy within its Local Plan which commits to seeking and securing (through planning permissions etc.) enhancements to aquatic biodiversity in the three Districts through the use of SuDS (subject to appropriate project-level studies to confirm feasibility including environmental risk and discussion with relevant authorities).

Response - This issue is addressed under Policy 2 Sustainable Communities, together with Policy 3 Environmental Protection and Enhancement, and the related supporting text.

7.5.1 Stakeholder Liaison

It is recommended that key partners involved in the development of the WCS maintain regular consultation with each other as development proposals progress.

Response - Agreed

7.5.2 WCS Review

Development phasing and new sites should continue to be monitored by GNA when future development plans evolve via the Council's Annual Monitoring Reports, to enable continued assessment on water supply and wastewater treatment. Where growth is expected to be significant, the Council should consider carrying out an update to the WCS to account for additional growth. In any future updates to the WCS, note should be taken of changes to the various studies and plans that support it.

Response – Development monitoring, including the information provided through the Annual Monitoring Reports, will continue.

7.5.3 Further water quality modelling

The assessment of wastewater capacity in this study has been undertaken by considering each WRC individually, and conservatively assessing the ability of watercourses to meet water quality conditions at the point of discharge. A catchment approach to modelling discharges, considering opportunities to make improvements at different WRC locations, and to consider wider catchment inputs should be considered by AWS, Natural England and the Environment Agency. Such an approach would allow more certainty to be provided on the scale of WRC upgrades required and allow the investment process to be optimised to obtain the most favourable environmental outcome. This is particularly important for improvements required at the designated Broads SAC and Broadland SPA sites which are hydrologically linked to many of the WRC discharges within the GNA. As well as maintaining current quality once the plan has been delivered, there is considerable scope to improve water quality through a combination of WRC improvements at key locations where the pollutant load is the highest, and growth will not prevent these improvements from being delivered.

Response – AWS, Natural England and the Environment Agency have been key partners involved in the production of the WCS, as well as consultees on the Local Plan. The information and recommendations in the WCS may also be useful for those bodies.