

## **Anglian Water Consultation Response**

### **Copford with Easthorpe Neighbourhood Plan Submission Consultation**

Anglian Water welcomes the opportunity to respond to the consultation on the Copford with Easthorpe Neighbourhood Plan submission version (Reg.16).

#### **Anglian Water**

Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a full quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding. Additionally, our region has the highest rate of housing growth outside of London and the South East. The initial 2021 census reports identifies that population growth in the region was 8.5% in the past decade. Population growth in Colchester was at a higher rate growing by 11.3% between 2011 and 2021.

Anglian Water has amended its Articles of Association to include the requirement that in undertaking these duties we will act in the public interest. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

#### **Anglian Water and the Neighbourhood Plan**

Anglian Water is the statutory water and sewerage undertaker for the Copford with Easthorpe neighbourhood plan area and is a statutory consultee under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan to ensure the plan delivers benefits for the residents, 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.

#### **Water Resources**

Copford with Easthorpe neighbourhood plan areas is within the South Essex Water Resource Zone (WRZ) – each WRZ is used to develop forecasts of supply and demand. Water is supplied from a combination of groundwater abstractions in the Essex Chalk Aquifer. Challenges we face include climate change, reduction in groundwater abstraction and population growth. This means we will need more resilience to supply customers throughout the Anglian Water region in the coming decades. Our plans to invest in the water supply network are set out in the [Water Resource Management Plan](#).

Measures to increase water efficiency with customers such as rainwater harvesting, enables supplies to be maintained.

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## Comments on the Copford with Easthorpe Neighbourhood Plan

- **Introduction**

Anglian Water welcomes the submission of the neighbourhood plan and supports the aspirations of the Parish Council to shape development and enhance the environment through decisions made by the district and county councils. It is noted that the neighbourhood plan has been prepared to be consistent with the adopted development plan – the North Essex Authorities’ Shared Strategic Section 1 Plan and the recently adopted Colchester Local Plan Section 2.

- **Context**

The neighbourhood plan does not allocate any sites for housing over and above the 120 homes allocated in Copford and Copford Green in the Colchester Local Plan Section 2, adopted in July 2022. The Colchester Local Plan identifies that:

"Wastewater and sewage infrastructure is over capacity and it will be necessary for these issues to be resolved prior to the start of development."

and

"There is a Water Recycling Centre located to the east of Copford village. Anglian Water has indicated that there are significant water supply and wastewater infrastructure capacity issues in Copford. To address this waste and water treatment from new developments in Copford will be directed to Colchester’s Water Recycling Centre. As a precautionary approach, development of these sites cannot come forward until there is sufficient water supply, network capacity, wastewater treatment and sewage infrastructure capacity to cope with the two developments. Where this cannot be demonstrated it will be necessary to seek further advice from Anglian Water."

The Draft DWMP 2025-2050 summary for the Copford WRC states that the medium-term strategy to 2035 is infiltration reduction and a new Dry Weather Flow (DWF) permit, with network attenuation. The long-term strategy to 2050 is 50% surface water removal from our network.

- **Objectives**

**Objective 5:** Anglian Water supports the aims of the objective that requires the protection of reliable, long-term supply of water services and all utilities serving the community. This aligns with our vision for a fully integrated water and water recycling system that is resilient to the effects of climate change, growth and severe drought, while fully protecting the environment.

**Objective 7:** The aims of the objective to mitigate for and adapt to the impacts of climate change are welcomed. We recognise the carbon impacts of managing customer’s water needs and so Anglian Water has made the commitment to be a net zero business by 2030. In addition, the promotion of the collection, control, conservation and effective use of water, including surface water is supported – this helps protect our water supply and manage flood risk. The resilience of our supplies and operations to the most extreme climate change impacts – particularly protracted drought and intense flooding – are significant long-term concerns which are addressed in our long-term strategies including the Water Resources Management Plan and the emerging Drainage and Wastewater Management Plan.

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- **Policies**

**Policy CE3 Design and Character:** The tackling of the climate emergency through design measures is supported. To ensure the policy links with the objectives and the Design Guidance and codes, we suggest that the first criterion includes reference to water efficiency. We would encourage the neighbourhood plan to be more ambitious in aims to exceed the water efficiency standards in the Local Plan of 110l per person per day. We suggest the wording is amended to state:

*“Is ambitious in tackling the challenge of climate emergency by meeting and where possible exceeding the minimum energy standards **and water efficiency standards**; reviewing and adopting new ideas and technology as they arise.”*

Anglian Water agrees that surface water run-off should be managed effectively and sustainably. We recommend the policy is strengthened in this regard to state:

*“Minimises **flood risk from surface water run-off through sustainable drainage measures including by applying permeable surface drainage**”*

**Policy CE6 Infrastructure and Local Community Facilities:** Anglian Water agrees with the policy aims to preserve, protect and promote reliable long-term supply of water as an essential utility service together with our statutory role of water recycling through our sewerage network. This is consistent with our purpose to bring environmental and social prosperity to the region through our commitment to love every drop.

**Policy CE7a Water Conservation:** The intention of the policy is well received, and we support the overall aims to conserve water. Water can be conserved in a number of ways, and we actively promote sustainable drainage systems and water efficiency and reuse. These can be combined to provide integrated water management systems that provide multiple benefits to communities. We would welcome support for water efficiency measures in new and existing properties as part of this policy and through its implementation. Anglian Water can also advise developers on SuDS and nature-based solutions for sites.

Whilst Anglian Water supports the policy intention, we consider it could be strengthened to provide a clearer ambition and intention that addresses the plan objectives, and links to the policy requirements set by policies CE3 and CE6, including the specific design code recommendations. We helpfully suggest the that the policy should be revised to include references to sustainable drainage systems (SuDS), water efficiency standards, in addition to water reuse:

*Development proposals will be supported which **clearly demonstrate water conservation principles including:***

- **The implementation of sustainable drainage systems (SuDS) such as the provision of porous surfaces and use of vegetation and planting schemes to slow run-off**
- **Water efficiency standards are met or exceeded**
- **Water reuse opportunities including rainwater harvesting are implemented.**
- ~~Limited use of paved areas~~

The aims of the policy would be consistent with The Colchester Local Plan policies that have regard to water conservation including Policy CC1: Climate Change, Policy PP1: Generic Infrastructure and

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Mitigation Requirements, and Policy DM25: Renewable Energy, Water, Waste and Recycling. Policy DM25 requires new dwellings to meet the optional water efficiency standard of 110 l/p/d.

The supporting text to policy CE7a could be amended to further encourage developments to exceed the water efficiency standards required by Local Plan Policy DM25

### **Conclusion**

Anglian Water supports the direction taken in the Copford with Easthorpe Neighbourhood Plan - subject to the suggested clarifications - and taken with the adopted Colchester Local Plan Section 2 is consistent with our strategic direction. Our view is that further prominence could be placed on achieving water conservation through SuDS and water efficiency/reuse both in new and existing development.