

Anglian Water Consultation Response

Colchester Draft Local Plan Consultation – Preferred Options

1. Anglian Water

- 1.1. 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 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, including inundation by the sea.
- 1.2. Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

2. Anglian Water and Local Plans

- 2.1. Anglian Water is the statutory water and sewerage undertaker for Colchester City Council area 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.

3. Commentary on the Draft Colchester Local Plan

- 3.1. Anglian Water on the preparation of the Local Plan and supporting evidence, including the Water Cycle Study (WCS). We have the following comments on the Draft Local Plan – Preferred Options:

Policy	Anglian Water comments
Vision	<p>Anglian Water welcomes the inclusion of 'creating a better environment' and maximising the opportunities provided through well-connected green networks'. The Vision is very succinct but may benefit from being expanded to say how these measures will help contribute to mitigating and adapting to climate change impacts and providing opportunities for nature recovery.</p> <p>Our Thriving East report identifies that Essex is the most populous county in our region, with almost 1.9 million people, 20% of the overall population. The Thriving Index ranks the region Anglian Water serves as England's second most challenged area, behind London. The Thriving Index pillars of climate change, economy and society, sustainable growth, nature and environment,</p>

	<p>highlight the specific challenges faced by the diverse landscapes, businesses, and people, offering a comparison across other English regions — and highlights specific opportunities to address them. The Index shows that at a county level, the greatest challenge for Essex is Nature and the Environment, characterised by poor river quality, unfavourable state of most SSSIs and very little private outdoor space. The outlook is a high climate change impact in terms of low rainfall projections, highest average temperatures, and above-average population increase.</p>
Themes and Objectives	<p>Sustainable: (First bullet point) It is unclear what 'green water' is meant to signify and the term 'wastewater' on its own is slightly abstract in terms of broader infrastructure delivery to support growth. Would it be simpler to state: "Improve existing facilities, and deliver sustainable and resilient infrastructure, including a multifunctional green network and waterways, utilities, roads, and schools."</p>
Policy ST2: Environment and the Green Network and Waterways	<p>Anglian Water is supportive of the policy aims to provide a multifunctional green network and waterways, that will contribute towards improving biodiversity and facilitate nature recovery in alignment with the Essex Local Nature Recovery Strategy (LNRS). Such measures will help communities adapt to climate change impacts through helping to reduce flood risk for example and improve water quality.</p> <p>It should be clear how a Green Network and Waterways Plan is prepared to avoid duplication in other reports and assessments needed to support the submission of planning applications. As a 'green infrastructure' led approach, we agree that the plan could form part of the Design and Access Statement, or for strategic sites, part of the masterplanning process. It is noted that further detail on the Green Network and Waterways principles is provided in Policy GN1.</p>
Policy ST3: Spatial Strategy	<p>Anglian Water notes that the Spatial Strategy directs growth to the most sustainable locations, with the focus on Colchester, with appropriate levels of growth in the large, medium, and small settlements. We consider that the Water Cycle Study is an important element in the evidence base to help inform the appropriate phasing of sites to align with infrastructure delivery, and policy response in terms of sustainable use of water resources, and infrastructure capacity for wastewater treatment.</p> <p>Anglian Water is committed to enabling sustainable growth and is collaborating with external stakeholders to find solutions to capacity challenges. We are working to secure policy and regulatory change that allows water companies to better support growth, for example by allowing us to invest strategically to create new capacity ahead of growth materialising, and by changing charging rules to allow for developer contributions to new infrastructure.</p>



	<p>Anglian Water is also working closely with Defra’s Ministerial Water Delivery Taskforce, regulators, and other stakeholders to resolve ongoing challenges around growth in our region. This includes working to bring forward a strategy to address dry weather flow capacity at Colchester WRC, so it has sufficient capacity to enable current and future growth (including growth identified in this emerging Colchester Local Plan and the Tendring and Colchester Borders Garden Community).</p>
<p>Policy ST4: Development in the Countryside</p>	<p>The policy does not specifically reference the delivery of utility services /infrastructure in the countryside, which would include critical water and wastewater infrastructure to serve existing and future communities. Our infrastructure, by its very nature is often located on the edge of settlements or in the countryside. We would suggest that the policy could be more positively framed to address these types of developments.</p> <p>We request the policy is amended in this regard to state: Proposals for the delivery and operation of essential utilities infrastructure, where there is a proven need and a countryside location is essential for the delivery of those utilities, will be supported where they accord with other policies in the development plan¹.</p>
<p>Policy ST5: Colchester’s Housing Need</p>	<p>Anglian Water notes the significant uplift to the local housing requirement following the revision to the National Planning Policy Framework and Planning Practice Guidance in December 2024. The 1,300 dwellings per annum average is significantly greater than the current local plan for the City Council area which will require a diversity of sites and development opportunities to meet the new target. The challenge will be to address any infrastructure shortfalls that may prevent sites coming forward in the short term.</p> <p>Existing commitments totalling 6,117 dwellings, have the benefit of planning consent and will have a right to connect to our networks for water supply and wastewater treatment under the Water Industry Act, whether sufficient capacity exists or not. Anglian Water will therefore have to manage the growth coming forward regardless of any capacity constraints. As a statutory consultee, Anglian Water is reliant on the planning system, to ensure new development coming forward is managed effectively, protects the environment and any risks associated with our assets are mitigated. The Stage 2 Water Cycle Study (WCS) identifies infrastructure opportunities and capacity constraints for new proposed sites in the draft Local Plan and makes recommendations for suitable policy measures to address these, to avoid harm to the environment and our customers.</p>

¹ Based on the wording in West Suffolk Local Plan Policy 24 Economic development and essential utilities in the countryside

<p>Policy ST6: Colchester's Employment Needs</p>	<p>Anglian Water's current position in terms of non-domestic water requests is set out in our Non-Domestic Water Requests Policy and will be particularly relevant for certain types of employment growth in manufacturing/industrial sectors.</p>
<p>Policy ST7: Infrastructure Delivery and Impact Mitigation</p>	<p>Anglian Water supports the policy approach to ensure that all development must be supported by the provision of infrastructure needed to serve the needs of the development.</p> <p>There is some concern that significant uplifts in both property and population in the short term, will be constrained by water recycling capacity, as our current Drainage and Wastewater Management Plan (DWMP 2025-2050) will have been prepared in advance of this national policy change to the calculation of the standard method. This increase in growth will be factored into the preparation of our next DWMP due to be published in 2028 (DWMP28). We are seeking to fully understand potential additional housebuilding programmes in the near and longer term for inclusion in this plan. The required level of housing may be delayed in some locations due to infrastructure constraints and the time it takes to fund and deliver capital investment often required for large scale growth. It is important that such constraints are factored into the Local Plan with phased delivery where necessary to allow for infrastructure investment to take place to facilitate sustainable growth and this is appropriately reflected in housing delivery trajectories.</p> <p>The Environment Act 2021 has made the preparation of DWMPs by water and sewerage companies a statutory requirement, and DWMP28 will be prepared under updated guidance published in May 2025, based on lessons learned from the first cycle of plans and the legal requirements now in place. The next DWMP must set out how we will manage and develop our drainage and sewerage systems to meet our obligations under Water Industry Act 1991. As with the Water Resources Management Plan (also in preparation for publication in 2029), this includes understanding how to deal with challenges such as asset health, climate change, and population growth. Using this information, we conduct a risk assessment for three different timescales: the short- (5yr), medium- (15yr) and long-(25yr +) term. The outputs from these allow us to develop 'best value' investment solutions to meet our obligations in subsequent Price Reviews.</p> <p>The Stage 2 Water Cycle Study identifies locations where capacity will be exceeded at our water recycling centres (WRCs) because of planned growth coming forward in the new Local Plan. Some locations will have sufficient capacity to allow growth to come forward in the short term, with additional investment being required in the medium to longer term to increase capacity. However, there will be locations where there is currently no capacity available and schemes will need to be brought forward to facilitate growth. As indicated in our response to Policy ST3 Spatial Strategy, Anglian Water is</p>

	<p>proactively working with the Council and stakeholders to address the capacity challenges at Colchester WRC, which is a key focus for growth, including delivery of TCBGC.</p>
<p>Policy ST8: Place Shaping Principles</p>	<p>Anglian Water supports this strategic policy to ensure that new development meets high standards of design, which are further detailed in subsequent policies in the draft Local Plan. We particularly support the place-making principles (clauses c. & d.) that refer to the integrated green network and waterways (also linked to Policy ST2) which has a strong relationship with the principles for climate change adaptation, including mitigation of flood risk and provision of biodiverse sustainable drainage systems.</p> <p>We also welcome reference to the principles (clause d.) to support water efficiency and provision of appropriate water supply and wastewater measures in this policy, which highlights the importance of a sustainable and resilient water supply that can be reinforced through integrated water management including rainwater harvesting and reuse, and greywater reuse. Water reuse measures can also have positive benefits for reducing the volume of wastewater needing to be treated at our WRCs.</p>
<p>Policy ST9: The Tendring and Colchester Borders Garden Community</p>	<p>Anglian Water supports the policy, which ensures that land is allocated for TCBGC. Anglian Water engaged on the preparation of the Development Plan Document for the Garden Community, and we have welcomed the policy approach taken to set principles for a sustainable and resilient community.</p> <p>As indicated in our response to Policy ST3 Spatial Strategy, Anglian Water is proactively working with the Council and stakeholders to address the capacity challenges at Colchester WRC, which is a key focus for growth, including delivery of TCBGC.</p>
<p>Policy EN2: Biodiversity Net Gain (BNG) and Environmental Net Gain</p>	<p>Anglian Water welcomes the policy requirement that all qualifying development must achieve BNG to at least the minimum statutory requirement of 10%. Whilst we note that developments that provide more than the statutory requirement will be favourably considered, we would support that statutory BNG requirement for projects delivering essential infrastructure. This is because BNG requirements cannot be met onsite for projects where Anglian Water is not the landowner as 30-year habitat management cannot be guaranteed. For example, linear pipeline schemes (such as those previously referenced) frequently cross multiple landownerships. These projects often have minimal impact on biodiversity, but when the full length of a scheme is considered, BNG requirements are already significant. In cases where Anglian Water is the landowner, scope for achieving BNG onsite is limited by the needs of site operations and the need to consider future infrastructure upgrades. Consequently, whilst other development types where onsite BNG is feasible and viable for going beyond the statutory BNG requirements (such as new housing allocations), it does not reflect the realities of delivering water infrastructure projects.</p>

	<p>Our proposed infrastructure upgrades and WINEP (Water Industry National Environment Programme) schemes in AMP8 are already delivering significant biodiversity and nature recovery benefits, which will help to deliver sustainable growth and improve the ecological quality of catchments and aligns with the Government’s 25 Year Environment Plan ambitions and wider agenda.</p>
<p>Policy EN5: New and Existing Trees</p>	<p>Anglian Water supports the policy requirements to facilitate opportunities for additional tree planting in new developments, including redeveloped sites and regeneration schemes. Improvements to green infrastructure and planting to reduce surface water run-off are direct benefits that can be achieved by planting the right tree in the right place.</p> <p>We would request that the policy also references underground utilities (such as water mains and sewers) in respect of new trees: Where new trees are proposed, consideration must be given to the possible conflict between new trees and built form and be compatible with highway considerations, <u>underground utilities</u>, and parking areas.</p> <p>For trees to thrive they need space for root development in the underlying soil, which must be of sufficient capacity to accommodate the rooting habits of the particular species, without impacting on the functioning of our underground assets. A sewer or lateral drain should not be located closer to trees/bushes/shrubs than the canopy width at mature height, except where special protection measures are provided - such as use of appropriate barriers to resist root ingress to the sewer system. The strategy should consider both the growth of tree roots and increased heave and ground movement due to climate change. A tree should not be planted directly over sewers or where excavation onto the sewer would require removal of the tree. To minimise the risk of root damage, tree planting should provide good growing conditions. Guidance can be found in ‘Trees in Hard Landscapes: A Guide for Delivery’.</p> <p>Anglian Water can also provide guidance for developers in considering water mains and sewer design and location which should inform tree protection steps and utility construction.</p>
<p>Policy EN8: Flood Risk and Sustainable Drainage Systems</p>	<p>Anglian Water supports the policy aims to ensure all new development is resilient to flood risk and surface water is managed through SuDS. We agree that the measures identified for the incorporation of SuDS is helpful to prioritise those measure that have the greatest benefit for biodiversity, ecosystem services, sustainable use of water resources, and improved water quality.</p> <p>We welcome the reference to the inclusion of grey and rainwater reuse systems, but we would request that reference to green roofs and water butts are removed from the policy. Green roofs effectively reduce flow of run-off</p>

from buildings through absorption rather than a direct form of rainwater reuse such as blue or blue/green roofs that contain a storage/reuse element. Whilst water butts are effective at reducing potable water for outside use in the garden, once they are full, they are then less effective at reducing surface water run-off. Whilst these measures could be referenced in the supporting text, we would welcome more effective integrated water management measures such as plot/community scale water reuse for new homes and businesses, that can effectively reduce potable water use and reduce surface water run-off. Further evidence can be obtained through the Enabling Water Smart Communities website www.ewsc.org.uk

Anglian Water is responsible for surface water drainage in the public sewer system. Our sewer networks can become overwhelmed when flooding occurs, and we agree that new development is located to minimise flood risk and mitigates surface water flood risk appropriately. Our [Flooding Incident Reduction Plan](#) is available on our website and sets out how we aim to mitigation flooding risks across our region. It is essential for the effective management of our operational risk that we ensure the risk posed from [surface water drainage](#) is clearly understood and considered by developers. Anglian Water has published [Surface Water Risk Management Guidance](#) that provides a comprehensive approach to how we will assess different site typologies in terms of surface water connections. **We would welcome reference to our Surface Water Risk Management Guidance in the policy and supporting text.**

We support the requirement to ensure the surface water drainage hierarchy has been followed - this is an essential pre-requisite to Anglian Water accepting a surface water drainage strategy together with agreement by the Lead Local Flood Authority (LLFA). If the LLFA are satisfied that, based upon evidence, no other option is feasible then a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow.

The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected to our surface water network until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated.

We request the policy is amended to ensure that no surface water is discharged to a foul sewer or a combined sewer via a new connection. Where proposals include a redevelopment of a brownfield site or changed surface

	<p>area draining to a combined sewer via an existing connection, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities (such as those listed in sub-paragraphs a-h) to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate.</p> <p>All surface and foul water flows should be separated. Under no circumstances will surface water be permitted to discharge into a separate foul sewer or to a combined sewerage system via a new connection. Existing connections to a combined sewer through redevelopment of a brownfield site, should provide betterment in terms of reduced flows to the combined sewer network.</p>
Policy EN9: Pollution and Contaminated Land	<p>Anglian Water requests that the policy remit is broadened to include other impacts on local amenity such as odour and introducing an 'agent of change' to an area. Development proposals for sensitive uses, including residential development, near our water recycling centres or pumping stations, must not put at risk the operation of our existing infrastructure, and that the Agent of Change Principle will apply.</p> <p>Our assets such as water recycling centres and pumping stations can be a source of odour and noise that may impact on sensitive receptors such as residential developments - we have developed guidance on encroachment buffers which can be found on our website.</p>
Policy GN1: Open Space with Green Network and Waterways Principles	<p>Anglian Water is supportive of the policy aims and welcome the incorporation of multifunctional green and blue spaces to support sustainable drainage and climate change that contribute to enhancing biodiversity and supporting nature recovery.</p>
Policy GN3: Local Green Spaces	<p>Anglian Water has large diameter combined and surface water sewers in the LGS for Middlewick Ranges and a water main within the Mount Bures Village Green. However, we do not consider that the Local Green Space (LGS) designation will have an impact regarding the maintenance and repair of our underground assets.</p>
Policy GN4: Tree Canopy Cover	<p>Please refer to our response to Policy EN5: New and Existing Trees which has the same implications regarding planting new trees and having regard to the protection of existing/planned underground utilities infrastructure including sewers and water mains.</p>
Policy NZ1: Net Zero Carbon Development (in operation)	<p>3.c. It might be helpful for the supporting text to explain where the EUI limits would not be applicable as some non-residential buildings will not be suitable if not built or designed for in whole or in part for human occupation e.g. operational buildings to support utilities infrastructure. We would question in circumstances where Approved Document Part L is not applicable</p>



	<p>to the building, then it is likely that that EUI limits for certain types of non-residential buildings will be unsuitable.</p>
<p>Policy NZ3: Wastewater and Water Supply</p>	<p>Anglian Water supports the inclusion of a separate policy regarding wastewater and water supply.</p> <p>Clause 2: Anglian Water recommends that the clause is amended to state: Development proposals should demonstrate that a water supply connection can be provided, and there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site.</p> <p>Developers should engage with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection to the water supply and wastewater networks to minimise impacts on existing communities and the environment. The submission, approval and implementation of a Foul Drainage Strategy should be required; providing details of any enhancements and demonstrating that there is capacity available in the sewerage network and at the receiving water recycling centre (WRC) to accommodate wastewater flows from the site prior to occupation of any dwellings. This should include the identification of a sustainable point of connection into the wastewater network, which is agreed with Anglian Water. We use a complexity matrix to identify a sustainable point of connection into our network, to minimise pollution risks and Storm Overflow spills, surcharges of our network, existing flood potential, and excess surface water flooding. Sustainable point of connections will be reflected in our planning responses and should be specified in a recommended planning condition. We would encourage this policy to state that where permanent measures are not possible, proposals will not be supported.</p> <p>Anglian Water takes its role in facilitating growth and place making very seriously. We work closely with the local planning authorities within our region to understand where and when demand for our services will be expected so that we can plan accordingly. We carefully plan for growth by understanding the impact of a development site on the foul and surface water network, our water recycling centres and water resources.</p> <p>Local Plan timetables and our five-year investment planning periods do not always align, and therefore, it is important that the proposed policy requirements to demonstrate that adequate foul water treatment and disposal infrastructure exists or can be provided to serve the development, continue to apply. This enables sufficient flexibility to mitigate impacts on existing infrastructure capacity, so that our charging mechanisms and investments can be brought forward to fund the infrastructure required.</p>

	<p>The Water Industry Act 1991 gives the owner or occupiers of premises the right to connect to the public network regardless of capacity constraints – this ‘right to connect’ only applies once a site has the benefit of an extant planning consent. Therefore, we are heavily reliant on the planning system to ensure proposed development is managed effectively, protects the environment and any risks associated with our assets are appropriately mitigated. We do this by recommending policy requirements, as set out above for this Policy NZ3, which then enables us to work effectively with developers to ensure a suitable foul drainage strategy is submitted with planning proposals. It is also legitimate to expect proposals to demonstrate that there is, or will be capacity in the sewerage network, since the Council may need to impose planning conditions to ensure that dwellings or other types of development are not occupied until the capacity is available. For larger developments we may request planning conditions be applied where there is a need to specify the phase(s) of development that can come forward before mitigation within the foul sewerage network is required.</p> <p>This is reinforced by the National Planning Policy Framework (Dec 2024, amended Feb 2025) paragraph 187(e) which makes clear that policies and decisions should “<i>contribute to and enhance the natural and local environment</i>” by (inter alia) “<i>preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution...</i>”.</p> <p>Clause 3 (water efficiencies)</p> <p>Anglian Water strongly supports the introduction of tighter water efficiency standards in new development that can help make development across the district more water efficient and allow sustainable growth, whilst longer term water supply solutions are being developed/implemented. As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-household growth, alongside other initiatives. Tighter water efficiency standards can also help to reduce the operational and capital carbon required to heat water in the home, deliver infrastructure, and pump and treat wastewater flows from new development.</p> <p>It would be helpful to reference the Shared Standards for Water Efficiency in Local Plans (published in June 2025) within the supporting text. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency, and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan</p>
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	<p>policies to support a clean and sustainable supply of water - essential for growth and nature recovery.</p> <p>The Shared Standards recommend that LPAs include Local Plan Policies that:</p> <ul style="list-style-type: none"> • Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible. • Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator. • Require new major non-domestic developments to include water saving measures and water reuse in their design. <p>These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy.</p> <p>Tighter water efficiency standards that can be justified by evidence set out in the annexes supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that:</p> <ul style="list-style-type: none"> • The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations (i.e. there are non-domestic water restrictions Anglian Water's area). • Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SSSIs in the Shared Standards area, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures. • At present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. In addition, water companies offer incentives to developers to build water efficient homes. These are tied into water
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	<p>company Business Plans that are published every five years, with the latest being published in 2025 alongside WRMPs.</p> <p>Anglian Water would further request the policy also introduces water efficiency standards for non-household development, in terms of aiming to meet the full credits in the four categories of BREEAM water calculators. The Shared Standards draft policy template suggests the following wording:</p> <ul style="list-style-type: none"> • New, extended or redeveloped non-household buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development. <p>Clause 4: Anglian Water supports the clause to explore the full range of options to achieve tighter water efficiency standards in large scale developments that have the potential to include community scale water (rainwater/greywater) reuse schemes. Evidence to support this can be found on the Enabling Water Smart Communities' (EWSC) website www.ewsc.org.uk. EWSC is an Ofwat innovation project exploring the relationship between integrated water management, community engagement and practices, and housing development to unlock new opportunities for reducing pressure on water resources, flood risk, and water pollution.</p> <p>Clause 5: Currently, we are in the position where we need to decline requests for non-domestic water that exceed 20m³ per day, in order to protect existing supplies and the environment until strategic supply options come online. A water resources assessment is now only required for Nationally Strategic Infrastructure Projects or Special Development Orders. We recognise that flexibility is required in the policy as circumstances may change through the lifetime of the Local Plan. We would welcome discussion with the Council on this clause and how it could be more appropriately worded so developers can demonstrate that any non-domestic water use proposed by the development can be supplied.</p> <p>Clause 6: Anglian Water requests that this clause is removed from the policy, as it is names specific WRC catchments based on the Water Cycle Study (WCS), where our suggested amendment to Clause 2 would encompass all proposals, and take account of future capacity changes and investments in our WRCs and wastewater networks. Matters as network and WRC capacity are dynamic and influenced by a wide range of factors over time and therefore the policy may become out of date.</p>
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	<p>Furthermore, the WCS states that short term capacity at Colchester WRC is uncertain due to the current location of the flowmeter, but is this not reflected in the policy - it is therefore considered that our suggested amendment to clause 2 is more appropriate to address all capacity matters, and ensure that the capacity of local WRCs and the wastewater network to accommodate additional flows from new development is relevant to a local planning authority's determination of planning applications. As previously referenced, Anglian Water are aware of the critical and strategic importance of Colchester WRC to delivering growth in and around the city, including TCBGC, and is proactively working with the Council and the government's Water Delivery Taskforce to address the current and future capacity challenges.</p> <p>Anglian Water is currently preparing the next iteration of the Drainage and Wastewater Management Plan, due to be published in 2028. The Environment Act 2021 has made the preparation of DWMPs by water and sewerage companies a statutory requirement, and DWMP2 will be prepared under updated guidance published in May 2025, based on lessons learned from the first cycle of plans and the legal requirements now in place.</p> <p>Clauses 7 & 8: Surface water discharge to the sewer network: We have suggested that appropriate clauses regarding the discharge of surface water to the public sewer are included in Policy EN8 which refers to managing surface water in accordance with the drainage hierarchy. This ensures consistency between managing flood risk and surface water run-off and aligns with our relationship with the LLFA on surface water risk management.</p> <p>Clause 9: Colchester WRC allocation: The final clause regarding land allocated for "an extension to the Anglian Water Services Colchester Water Recycling Centre" is welcomed. However, future investment at the site includes progressing with plans for an advanced water recycling plant. Effluent received at Colchester WRC is treated to a high standard before it is discharged to the estuary. Anglian Water will further treat some of the already treated effluent again using membrane technology before transferring it to Ardleigh Reservoir where it will mix with river water. This option would provide up to 15.2 MI/d into Ardleigh Reservoir for supply across the Water Resource Zone. Anglian Water has received Accelerated Infrastructure Delivery funding to progress this recycling scheme including delivery of a demonstration centre and the transfer pipeline to take water from the WRC to Ardleigh Reservoir. Currently this option would put additional water into supply as soon as 2035.</p>
<p>Policy NZ4: Renewable Energy</p>	<p>Anglian Water supports the policy to facilitate the delivery of renewable energy schemes. Anglian Water is always looking for ways to reduce our carbon emissions and become a fully net zero carbon business by 2030. Renewable energy is a key step towards our ambitious goal of</p>

	<p>becoming a carbon neutral business, and renewable energy schemes help to provide energy security and resilience for critical infrastructure.</p> <p>We use land at or close to our operational sites to create solar arrays and generate renewable energy. It is an efficient way of maximising the space we have. We are also trialling an energy storage solution that will allow us to store excess solar energy generated during the day in batteries and use it at other times, helping us to reduce our reliance on energy from the grid. It is important that our sites are a safe space for wildlife too, which is why we undertake comprehensive ecological surveys to ensure that solar panels will exist in harmony with nature for the whole of their life span.</p>
Policy CS6: Caravan Parks	<p>Anglian Water supports the requirement for the developer to seek confirmation with us that there is adequate wastewater treatment and sewage infrastructure capacity to serve the caravan park and avoid adverse impacts on water quality. This clause is consistent with our request for an amendment to clause 2 in Policy NZ3.</p> <p>Such confirmation with Anglian Water must be sought in advance of the submission of the planning application and within the previous 12 months to address both network and treatment capacity and ideally set out in a foul drainage assessment for the site. When we undertake drainage connection assessments for developers these are only valid for 12 months, as there are multiple factors that can impact on capacity in our networks, and dry weather flow headroom at our water recycling centres (WRCs).</p>
Policy PC4: Development Density	<p>Development density is a key factor in delivering community scale rainwater reuse schemes. The report Water reuse in new housing: Understanding the business case published on the EWSC website identifies the benefits of examining in greater detail the relationship between development density and the respective cost of community versus on-plot installations, due to the significance of external pipework costs as a component of the total cost within community systems. Community scale systems yield cost savings over on-plot reuse above densities of around 60 units/ha - concluding that it is density not the size of development which is the deciding factor.</p>
Policy PC6: Design and Amenity	<p>Anglian Water supports the policy requirements to achieve high standards of design in new developments. Many of the design requirements align with other policy themes around surface water management and SuDS, flood risk, and green infrastructure, to demonstrate how important these features are to successful place-making and climate resilience. Anglian Water would welcome reference to improved water efficiency in clause h:</p> <p>Minimise carbon emissions and energy use through sustainable design solutions such as orientation, massing, natural ventilation, and tree planting. Incorporate water efficient measures, sustainable drainage systems, and biodiversity enhancements to contribute to climate resilience;</p>

<p>Policy PP1: Britannia Car Park, Colchester</p>	<p>Anglian Water supports the policy criteria g, h, and i. These measures help to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p> <p>Anglian Water has existing assets within the site boundary which include a large diameter combined sewer. 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. We request that the following wording is added to the policy:</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure. <p>We recognise that several sites may have our existing assets located within or along the site boundaries. The Council may wish to consider an additional clause added to Policy NZ3 to stipulate that developers should safeguard suitable access for the maintenance of existing water supply and sewerage infrastructure when considering the design and layout of development proposals. For site allocations any identified water supply or sewerage infrastructure could be referenced in the supporting text.</p>
<p>Policy PP2: Vineyard Gate, Colchester</p>	<p>As for PP1, Anglian Water supports the policy criteria h, i and j - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow</p>

	<p>rate. No new surface water connections to the combined sewer will be accepted.</p> <p>Similarly, there are existing Anglian Water assets within and adjoining the site boundary which include a large diameter combined sewer. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.
<p>Policy PP3: St Runwalds Street Car Park, Colchester</p>	<p>As for PP1, Anglian Water supports the policy criteria f, g, and h - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p> <p>Similarly, there are existing Anglian Water assets within and adjoining the site boundary which include combined sewers. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.
<p>Policy PP4: Braiswick, Colchester</p>	<p>As for PP1, Anglian Water supports the policy criteria g, h, and i - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>For greenfield sites (or sites with no existing surface water connection), no new surface water connections to the combined sewer will be accepted. New developments must provide adequate drainage for both foul and stormwater in separate networks.</p>

<p>Policy PP5: Land at Chesterwell, Colchester</p>	<p>As for PP1, Anglian Water supports the policy criteria g, h, and i - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>For greenfield sites (or sites with no existing surface water connection), no new surface water connections to the combined sewer will be accepted. New developments must provide adequate drainage for both foul and stormwater in separate networks.</p>
<p>Policy PP6: Land at Colchester North Station Mixed Used</p>	<p>As for PP1, Anglian Water supports the policy criteria j, k, and l - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity. We further support policy criterion m, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p> <p>There are existing Anglian Water assets within and adjoining the site boundary which include a surface water sewer. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.
<p>Policy PP7: Land off Bakers Lane, Colchester</p>	<p>As for PP1, Anglian Water supports the policy criteria h, i and j - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity. We further support policy criterion k, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>For greenfield sites (or sites with no existing surface water connection), no new surface water connections to the combined sewer will be accepted. New developments must provide adequate drainage for both foul and stormwater in separate networks.</p>

<p>Policy OA4: Northern Gateway</p>	<p>As for PP1, Anglian Water supports the policy criteria i, j, and k - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity. We further support policy criterion l, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>For greenfield sites (or sites with no existing surface water connection), no new surface water connections to the combined sewer will be accepted. New developments must provide adequate drainage for both foul and stormwater in separate networks.</p> <p>There are existing Anglian Water assets within and adjoining the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.
<p>Policy PEP1: Colchester Business Park</p>	<p>As for PP1, Anglian Water supports the policy criteria d, e, and f - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>For greenfield sites (or sites with no existing surface water connection), no new surface water connections to the combined sewer will be accepted. New developments must provide adequate drainage for both foul and stormwater in separate networks.</p>
<p>Policy PP8: Land at Lakelands Crescent, Colchester</p>	<p>As for PP1, Anglian Water supports the policy criteria e, f, and g - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>For greenfield sites (or sites with no existing surface water connection), no new surface water connections to the combined sewer will be accepted. New developments must provide adequate drainage for both foul and stormwater in separate networks. The existing developments in this area have separate foul and surface water sewer networks.</p>
<p>Policy PEP4 Maldon Road</p>	<p>As for PP1, Anglian Water supports the policy criteria d and e- to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p>

	<p>It is noted for this policy there is no criterion for discharge of attenuated surface water, and we consider that this may be an oversight. For greenfield sites (or sites with no existing surface water connection), no new surface water connections to the combined sewer will be accepted. New developments must provide adequate drainage for both foul and stormwater in separate networks. The existing developments in this area have separate foul and surface water sewer networks.</p> <p>There are existing Anglian Water assets within and adjoining the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.
Policy PP9: North-East Colchester	<p>Anglian Water supports the policy criteria o, p, and q - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity. We further support policy criterion r, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>For greenfield sites (or sites with no existing surface water connection), no new surface water connections to the combined sewer will be accepted. New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that a strategic site of this scale should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy, with reuse (as indicated in Policy NZ3) one of the key considerations for developments at this scale.</p> <p>There are existing Anglian Water assets within and adjoining the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply infrastructure. <p>Anglian Water welcomes the policy requirement for a comprehensive masterplan for the entire allocation, and that this should be developed in collaboration with the Council and relevant infrastructure providers.</p>
Policy PP10: Land South of	<p>Anglian Water supports the policy criteria k, l, and m - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency,</p>

Berechurch Hall Road, Colchester	<p>and ensuring there is wastewater treatment capacity. We further support policy criterion n, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>For greenfield sites (or sites with no existing surface water connection), no new surface water connections to the combined sewer will be accepted. New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that a strategic site of this scale should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy, with reuse (as indicated in Policy NZ3) one of the key considerations for developments at this scale.</p> <p>Anglian Water welcomes the policy requirement for a comprehensive masterplan for the entire allocation, and that this should be developed in collaboration with the Council and relevant infrastructure providers.</p>
Policy PP11: Europit Site, Colchester	<p>Anglian Water supports the policy criteria h, i and j - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p> <p>Similarly, there are existing Anglian Water assets within and adjoining the site boundary which include a large diameter surface water sewer. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.
Policy PP12: Land at Robertson Van Hire Site, Colchester	<p>Anglian Water supports the policy criteria f, g, and h - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p>

	<p>As indicated in our response to Policy EN8, where proposals include a redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p>
<p>Policy PP13: 146 Magdalen Street Site, Colchester</p>	<p>Anglian Water supports the policy criteria f, g, and h - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>As indicated in our response to Policy EN8, where proposals include a redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p>
<p>Policy PP14: Gas Works and Hythe Scrap Yard Site, Colchester</p>	<p>Anglian Water supports the policy criteria l, m, and n - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity. We further support policy criterion o, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p> <p>There are existing Anglian Water assets within and adjoining the site boundary which include surface water sewers and a large diameter combined sewer. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in</p>

	<p>the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure. <p>Anglia Water agrees that residential development should avoid areas of flood risk identified in areas of the site and contribute to flood risk solutions. We would support green and blue infrastructure led interventions where possible.</p>
<p>Policy PP15: Hawkins Road, Colchester</p>	<p>Anglia Water supports the policy criteria j, k, and l - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p> <p>It is noted that the site is rated red (rank of 1) with over 5% of the site is within the flood zone 3b extent in the Sequential Test Database. The Local Plan Sequential Test states that 100% of the site is within flood zone 3b. Whilst regeneration sites, such as the Hythe Regeneration Area, can bring sustainability benefits and opportunities, we question whether these benefits have substantial enough weight when considered against revised climate change allowances, the potential for increased sewer flood risk/hydraulic overloading, and the embodied (capital carbon) and design-life of new buildings and supporting infrastructure. The Sequential Test report identifies that where the exceptions test is required, this will be applied as part of the Level 2 SFRA, which will be produced in support of the Reg 19 Submission Local Plan, and should provide further policy recommendations to safeguard new residential development in climate vulnerable areas.</p>
<p>Policy PP16: Coal Yard Site</p>	<p>Anglia Water supports the policy criteria i, j and k- to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use</p>



	<p>opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p> <p>There are existing Anglian Water assets within and adjoining the site boundary which include surface water sewers and a large diameter combined sewer. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure. <p>It is noted that the site is rated red (rank of 1) with over 5% of the site is within the flood zone 3b extent in the Sequential Test Database. The Local Plan Sequential Test states that 24% of the site is within flood zone 3b. Whilst regeneration sites, such as the Hythe Regeneration Area, can bring sustainability benefits and opportunities, we question whether these benefits have substantial enough weight when considered against revised climate change allowances, the potential for increased sewer flood risk/hydraulic overloading, and the embodied (capital carbon) and design-life of new buildings and supporting infrastructure. The Sequential Test report identifies that where the exceptions test is required, this will be applied as part of the Level 2 SFRA, which will be produced in support of the Reg 19 Submission Local Plan, and should provide further policy recommendations to safeguard new residential development in climate vulnerable areas.</p>
<p>Policy OA1: King Edward Quay Opportunity Area</p>	<p>Anglian Water supports the policy criteria j, k, and l - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity. We further support policy criterion n, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p>

	<p>There are existing Anglian Water assets within and adjoining the site boundary which include surface water sewers and large diameter combined sewers. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure. <p>It is noted that the site is rated red (rank of 1) with over 5% of the site is within the flood zone 3b extent in the Sequential Test Database. The Local Plan Sequential Test states that 60% of the site is within flood zone 3b. Whilst regeneration sites, such as the Hythe Regeneration Area, can bring sustainability benefits and opportunities, we question whether these benefits have substantial enough weight when considered against revised climate change allowances, the potential for increased sewer flood risk/hydraulic overloading, and the embodied (capital carbon) and design-life of new buildings and supporting infrastructure. The Sequential Test report identifies that where the exceptions test is required, this will be applied as part of the Level 2 SFRA, which will be produced in support of the Reg 19 Submission Local Plan, and should provide further policy recommendations to safeguard new residential development in climate vulnerable areas.</p> <p>Anglian Water agrees that development proposals on the site should provide flood storage areas, however the policy wording to "consider or explore" opportunities may fall short of actual provision on site. We would support green and blue infrastructure led interventions wherever possible or feasible to minimise flood risk.</p>
<p>Policy OA2: Land East of Hawkins Road Opportunity Area</p>	<p>Anglian Water supports the policy criteria h, i and j- to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity. We further support policy criterion k, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p>

	<p>There are existing Anglian Water assets within and adjoining the site boundary which include large diameter combined sewers. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure. <p>It is noted that the site is rated red (rank of 1) with over 5% of the site is within the flood zone 3b extent in the Sequential Test Database. The Local Plan Sequential Test states that 100% of the site is within flood zone 3b. Whilst regeneration sites, such as the Hythe Regeneration Area, can bring sustainability benefits and opportunities, we question whether these benefits have substantial enough weight when considered against revised climate change allowances, the potential for increased sewer flood risk/hydraulic overloading, and the embodied (capital carbon) and design-life of new buildings and supporting infrastructure. The Sequential Test report identifies that where the exceptions test is required, this will be applied as part of the Level 2 SFRA, which will be produced in support of the Reg 19 Submission Local Plan, and should provide further policy recommendations to safeguard new residential development in climate vulnerable areas.</p> <p>Anglian Water agrees that development proposals on the site should provide flood storage areas, however the policy wording to "consider or explore" opportunities may fall short of actual provision on site. We would support green and blue infrastructure led interventions wherever possible or feasible to minimise flood risk.</p>
<p>Policy OA3: Magdalen Street Opportunity Area</p>	<p>Anglian Water supports the policy criteria i, j and k - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity. We further support policy criterion l, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>As indicated in our response to Policy EN8, where proposals include the redevelopment of a brownfield site or changed surface area draining surface water to a combined sewer <u>via an existing connection</u>, Anglian Water will use opportunities presented by new development to reduce exposure to pollution risk in the existing sewer network. As such, we expect new development to exploit all practicable opportunities to reduce surface water flow to the combined sewer network, in terms of volume and discharge flow rate. No new surface water connections to the combined sewer will be accepted.</p>

Policy PEP2 Knowledge Gateway	Anglian Water recognises that some of the Knowledge Gateway is already developed and there are further economic growth opportunities in this area for associated development to come forward to maximise the economic and social benefits associated with the University. We would request that similar policy criteria to other allocation sites are included to ensure that flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity.
Policy UE1 University of Essex	There are no specific criteria regarding management of surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity for the expansion of the University. Anglian Water considers that these matters will be addressed through the relevant policies in the plan including Policy EN8 and Policy NZ3 - subject to further amendments proposed in our response.
Policy PP17: Land South of A12, Marks Tey Growth Area	<p>Anglian Water supports the policy criteria m, n, and o- to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. We further support policy criterion p, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that a strategic site of this scale should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy, with reuse (as indicated in Policy NZ3) one of the key considerations for developments at this scale.</p> <p>Anglian Water welcomes the policy requirement for a comprehensive masterplan for the entire allocation, and that this should be developed in collaboration with the Council and relevant infrastructure providers.</p> <p>Marks Tey is within Copford WRC catchment as identified in the WCS section 8.4. This indicates that there is currently capacity available at the WRC to accommodate growth in the short to medium term, but further dry weather flow capacity will be required to treat wastewater flows from the full quantum of growth proposed in the catchment. Anglian Water has identified a growth scheme for Copford WRC in the PR24 Business Plan for delivery in AMP8 (2025-2030). The WRC growth schemes identified for AMP8 will continue to be developed by our Asset Delivery Planning team.</p> <p>A key component of our Water Industry National Environment Program (WINEP) Asset Management Plan 8 (AMP 8) includes measures to reduce nutrients from the discharges at some of our Water Recycling Centres (WRCs). This includes reducing levels of phosphorus to technically achievable</p>

	<p>limits at some sites. Anglian Water is working with the Environment Agency on alternative options to accommodate additional growth at WRCs that are already required to meet technically achievable limits (TAL) for phosphorus but will also need to accommodate additional growth through increasing dry weather flow capacity. Potential solutions being explored include catchment approaches and investments in removing phosphorus from wastewater discharges at upstream WRCs. These solutions will need to be identified through the next DWMP and PR29 Business Plan to seek investment for what is needed to support growth without deterioration to water quality. Copford WRC is identified as a location with a WINEP driver to achieve TAL for Phosphorus by March 2030.</p>
<p>Policy PP18: Land North of A120, Marks Tey Growth Area</p>	<p>Anglian Water supports the policy criteria n, o, and p - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. We further support policy criterion q, which identifies specific infrastructure needs including water supply and wastewater infrastructure. Please see commentary in relation to Copford WRC in Policy PP17.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that a strategic site of this scale should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy, with reuse (as indicated in Policy NZ3) one of the key considerations for developments at this scale.</p> <p>Anglian Water welcomes the policy requirement for a comprehensive masterplan for the entire allocation, and that this should be developed in collaboration with the Council and relevant infrastructure providers.</p>
<p>Policy PEP5 Land South of A12, Marks Tey</p>	<p>Anglian Water supports the policy criteria d, e, and f - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity. Please see commentary in relation to Copford WRC in Policy PP17.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that a strategic employment site of this scale should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy, with reuse (as indicated in Policy NZ3) one of the key considerations for developments at this scale.</p>
<p>Policy PEP6: Anderson's Site, Marks Tey.</p>	<p>Whilst it is noted that this employment site is safeguarded, there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS,</p>



	<p>improve water efficiency, and ensure there is wastewater treatment capacity. New development must provide adequate drainage for both foul and stormwater in separate networks. Please see commentary in relation to Copford WRC in Policy PP17.</p> <p>There are existing Anglian Water assets within and adjoining the site boundary which include a rising main (pressurised sewer). As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure. <p>It is noted that this site has the benefit of extant planning consent for employment uses. It would be helpful for supporting text to provide context in relation to its planning status. However, until the development is considered, there is potentially a need for policy criteria to guide planning applications for the site.</p>
<p>Policy PP19: Land North of Oak Road, Tiptree</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. New development must also provide adequate drainage for both foul and stormwater in separate networks. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PP19 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors.</p> <p>Anglian Water welcomes the policy requirement for a comprehensive masterplan for the entire allocation, and that this should be developed in collaboration with the Council and relevant infrastructure providers.</p> <p>We would also question whether the Tiptree Neighbourhood Plan (TNP) policies could apply in all circumstances, given the largest area of the allocation is outside the Neighbourhood Plan area where the TNP policies are not directly applicable as part of the development plan.</p> <p>Tiptree WRC catchment as identified in the WCS section 8.12 indicates that there is currently capacity available at the WRC to accommodate growth in the short to medium term, but further dry weather flow capacity will be required to treat wastewater flows from the full quantum of growth proposed in the catchment within the plan period. This would require investment to be identified in subsequent AMPs.</p>

	<p>The Environment Act 2021 has made the preparation of DWMPs by water and sewerage companies a statutory requirement, and DWMP28 (2030-2055) will be prepared under updated guidance published in May 2025, based on lessons learned from the first cycle of plans and the legal requirements now in place. This next DWMP must set out how we will manage and develop our drainage and sewerage systems to meet our obligations under Water Industry Act 1991. As with the WRMP, this includes understanding how to deal with challenges such as asset health, climate change, and population growth. Using this information, we will conduct a risk assessment for three different timescales: the short- (5yr), medium- (15yr) and long-(25yr +) term. The outputs from these allow us to develop 'best value' investment solutions to meet our obligations.</p>
<p>Policy PP20: Land at Bonnie Blue Oak, Tiptree</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PP20 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors. See comments on Tiptree WRC set out in Policy PP19.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks.</p>
<p>Policy PP21: Highlands, Kelvedon Road, Tiptree</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PP21 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors. See comments on Tiptree WRC set out in Policy PP19.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks.</p> <p>See comments on Policy PEP7 regarding safeguarding employment land.</p>
<p>Policy PP22: Telephone Exchange, Tiptree</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PP22 to ensure a consistent approach to site allocations, and to recognise that</p>

	<p>network and WRC capacity is dynamic and can change over time owing to a range of factors. See comments on Tiptree WRC set out in Policy PP19.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks.</p> <p>There is an existing Anglian Water asset (water main) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply infrastructure.
<p>Policy PEP7: Highland Nursery, Tiptree</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PEP7 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors. See comments on Tiptree WRC set out in Policy PP19.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks.</p> <p>It is not clear from the Local Plan or the online interactive policies map that this site is both a potential residential site (Policy PP21) and a safeguarded employment site (Policy PEP7). If the site is proposed for residential development, then it is confusing to also safeguard the site as employment land, given there is no site context/supporting text provided to explain the situation.</p>
<p>Policy PEP8: Land South of Factory Hill, Tiptree</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PEP8 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors. See comments on Tiptree WRC set out in Policy PP19.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks.</p>

	<p>There are existing Anglian Water assets (rising mains) within the site boundary and a watermain to the north-eastern boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.
<p>Policy PP23: Land East Dawes Lane, West Mersea</p>	<p>Anglian Water supports the policy criteria k and l - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. We further support policy criterion m, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that this greenfield site should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy. The policy does not appear to include a clause to state the "Development must not discharge surface water to the foul water network" - we would request this is included in this policy.</p> <p>West Mersea WRC has dry weather flow capacity to accommodate growth in the catchment, as indicated in section 8.14 of the WCS. However, the developer would be advised to engage with Anglian Water to assess a sustainable point of connection into the sewer network, as required by the policy.</p>
<p>Policy PP24: Land Northwest of the Fire Station, Wivenhoe</p>	<p>Anglian Water supports the policy criteria k, l, and m - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity. We further support policy criterion n, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>In relation to criterion k - for greenfield sites (or sites with no existing surface water connection), no new surface water connections to the combined sewer will be accepted. New developments must provide adequate drainage for both foul and stormwater in separate networks.</p> <p>There is an existing Anglian Water asset (foul sewer) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p>

	<ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure. <p>The site is within Colchester WRC catchments - previous commentary regarding Colchester WRC in our response will apply.</p>
<p>Policy PP25: View Park, Abberton and Langenhoe</p>	<p>Anglian Water supports the policy criteria h, i and j - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity specifically in relation to capacity at the WRC.</p> <p>New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that this greenfield site should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy. We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>There are existing Anglian Water assets (water mains) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply infrastructure. <p>The site is within the catchment of Fingringhoe WRC, which currently does not have capacity to accommodate future growth - as identified in the WCS, section 8.8. Anglian Water has identified a growth scheme for Fingringhoe WRC in the PR24 Business Plan for delivery in AMP8 (2025-2030). The WRC growth schemes identified for AMP8 will continue to be developed by our Asset Delivery Planning team. Sites will need to be phased to ensure alignment with infrastructure delivery. Currently, Anglian Water will recommend a pre-occupancy planning condition for planning applications seeking new development, to ensure that our infrastructure delivered before new homes or businesses are occupied and generating wastewater flows. This is to prevent environmental deterioration until the correct infrastructure and updated permits are in place.</p>
<p>Policy PP26: Land North of Boxted Straight Road, Boxted Cross</p>	<p>Anglian Water supports the policy criteria h, i and j - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity specifically in relation to capacity at the WRC. We further support policy criterion k, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p>

	<p>New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that this greenfield site should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy. We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>As identified in the WCS section 8.10, Langham (Essex) WRC was identified for a growth scheme to increase DWF capacity - this was for design in AMP7 (2020-2025) and construction in AMP8 (2025-2030).</p> <p>Due to the size of the AMP8 programme, we are assessing the delivery timescales for this scheme. The WRC and local network is at capacity and will not address the full quantum of the potential emerging allocations, and a growth scheme in subsequent AMPs may still be required to accommodate the quantum of growth planned for the catchment, once there is higher confidence in sites coming forward e.g. as an allocation in an adopted Local Plan - unless alternative solutions are identified.</p> <p>Langham has long-standing issues in terms of both network capacity and WRC capacity, particularly because of significant infiltration into our network. A programme of sewer relining was undertaken in AMP5, and additional surveys were undertaken in AMP7. Further measures will need to be identified to address the results of the survey findings. Due to the environmental constraints in this area, future growth may be challenging to accommodate within the wastewater network and the WRC. If further capacity can be made available at the WRC, a sustainable point of connection will be required to avoid adverse impacts on the existing network.</p>
<p>Policy PP27: Swan Grove, Chappel</p>	<p>Anglian Water supports the policy criteria g and h - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary.</p> <p>New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that this greenfield site should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy. We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>There is an existing Anglian Water asset (foul sewer) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding</p>

	<p>reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure. <p>The site is within the catchment of Earls Colne WRC, which currently does not have capacity to accommodate future growth - as identified in the WCS, section 8.6. Anglian Water has identified a growth scheme for Earls Colne WRC in the PR24 Business Plan for delivery in AMP8 (2025-2030). The WRC growth schemes identified for AMP8 will continue to be developed by our Asset Delivery Planning team. Sites will need to be phased to ensure alignment with infrastructure delivery. Currently, Anglian Water will recommend a pre-occupancy planning condition for planning applications seeking new development, to ensure that our infrastructure delivered before new homes or businesses are occupied and generating wastewater flows. This is to prevent environmental deterioration until the correct infrastructure and updated permits are in place.</p>
<p>Policy PP28: Land West of Station Road, Wakes Colne</p>	<p>Anglian Water supports the policy criteria k and l - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. We further support policy criterion m, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that this greenfield site should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy, with reuse (as indicated in Policy NZ3) one of the key considerations for developments at this scale. We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>See comments regarding Earls Colne WRC set out in Policy PP27.</p>
<p>Policy PEP12 Land at Wakes Hall Business Centre</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PEP12 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors.</p>

	<p>We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>See comments regarding Earls Colne WRC set out in Policy PP27.</p>
<p>Policy PP29: Land East of School Road, Copford</p>	<p>Anglian Water supports the policy criteria m, n, and o - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. We further support policy criterion p, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that a strategic site of this scale should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy, with reuse (as indicated in Policy NZ3) one of the key considerations for developments at this scale.</p> <p>Anglian Water welcomes the policy requirement for a comprehensive masterplan for the entire allocation, and that this should be developed in collaboration with the Council and relevant infrastructure providers.</p> <p>Anglian Water requests that land in the ownership of Anglian Water that relates to the Copford-School Road sewer pumping station (located between the Hall and Playground with access) is omitted from the site allocation. Furthermore, in respect of our asset encroachment policy and to ensure that sensitive receptors are not impacted by noise or odour, we recommend a 15m buffer from the pumping station to any residential curtilage is included as part of the design and layout of the site.</p> <p>The site is also close to Copford WRC. Based on our risk assessment for encroachment, the site lies just outside the buffer zone. However, the WRC has been identified for a growth scheme which will mean a greater volume of flows would be treated at the site. This may be a factor for consideration when development proposals are submitted for the site. We support the inclusion of policy criterion l, to liaise with Essex County Council in respect of waste matters, as the site will be within the 400m wastewater consultation zone identified by the Waste Local Plan for Essex.</p> <p>There are existing Anglian Water assets (foul sewers and rising mains) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p>

	<ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure. <p>Please see commentary in relation to Copford WRC in Policy PP17.</p>
<p>Policy PP30: Land South of Long Road, Dedham</p>	<p>Anglian Water supports the policy criteria i, j and k - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation and phasing to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity specifically in relation to capacity at the WRC.</p> <p>New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that this greenfield site should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy. We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>As indicated by the WCS, section 8.5, Dedham WRC currently does not have capacity to accommodate further growth, and there is no identified growth scheme in our PR24 Business Plan for AMP8 (2025-2030). Development would need to be phased for delivery to align with future investments in subsequent AMPs.</p> <p>The Environment Act 2021 has made the preparation of DWMPs by water and sewerage companies a statutory requirement, and DWMP28 (2030-2055) will be prepared under updated guidance published in May 2025, based on lessons learned from the first cycle of plans and the legal requirements now in place. This next DWMP must set out how we will manage and develop our drainage and sewerage systems to meet our obligations under Water Industry Act 1991. As with the WRMP, this includes understanding how to deal with challenges such as asset health, climate change, and population growth. Using this information, we will conduct a risk assessment for three different timescales: the short- (5yr), medium- (15yr) and long-(25yr +) term. The outputs from these allow us to develop 'best value' investment solutions to meet our obligations.</p>
<p>Policy PP31: Land North of Halstead Road and East of Wood Lane, Eight Ash Green</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PP31 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors.</p> <p>New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that this greenfield site</p>



	<p>should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy. We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>In respect of our asset encroachment policy and to ensure that sensitive receptors are not impacted by noise or odour, we recommend a 15m buffer from the EIGHT ASH GREEN-CHOATS/WOOD CNR sewer pumping station to any residential curtilage is included as part of the design and layout of the site.</p> <p>There are existing Anglian Water assets (water mains) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply infrastructure. <p>As indicated in the WCS, section 8.7, Eight Ash Green is identified to have sufficient dry weather flow capacity for proposed growth in the Local Plan in the short to medium term, and capacity would be exceeded by the end of the plan period. Additional dry weather flow capacity will be required to treat wastewater flows from the full quantum of growth proposed in the catchment within the plan period. This would require investment to be identified in subsequent AMPs.</p> <p>The Environment Act 2021 has made the preparation of DWMPs by water and sewerage companies a statutory requirement, and DWMP28 (2030-2055) will be prepared under updated guidance published in May 2025, based on lessons learned from the first cycle of plans and the legal requirements now in place. This next DWMP must set out how we will manage and develop our drainage and sewerage systems to meet our obligations under Water Industry Act 1991. As with the WRMP, this includes understanding how to deal with challenges such as asset health, climate change, and population growth. Using this information, we will conduct a risk assessment for three different timescales: the short- (5yr), medium- (15yr) and long-(25yr +) term. The outputs from these allow us to develop 'best value' investment solutions to meet our obligations.</p>
<p>Policy PP32: Land North of Halstead Road and West of Fiddlers Wood, Eight Ash Green</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PP31 to ensure a consistent approach to site allocations, and to recognise that</p>

	<p>network and WRC capacity is dynamic and can change over time owing to a range of factors.</p> <p>New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that this greenfield site should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy. We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>In respect of our asset encroachment policy and to ensure that sensitive receptors are not impacted by noise or odour, we recommend a 15m buffer from the EIGHT ASH GREEN-CHOATS/WOOD CNR sewer pumping station to any residential curtilage is included as part of the design and layout of the site.</p> <p>There are existing Anglian Water assets (water mains) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply infrastructure. <p>See comments regarding Eight Ash Green WRC set out in Policy PP31.</p>
<p>Policy PEP9 Bullbanks Farm, Eight Ash Green</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PEP9 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors.</p> <p>We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>See comments regarding Eight Ash Green WRC set out in Policy PP31.</p>
<p>Policy PP33: Land East of Plummers, Fordham</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PP33 to</p>



	<p>ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors.</p> <p>We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>See comments regarding Eight Ash Green WRC set out in Policy PP31.</p>
<p>Policy PP34: Land North of Coach Road, Great Horkesley</p>	<p>Anglian Water supports the policy criteria i, j and k - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. We further support policy criterion n, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks (criterion h). It is expected that a strategic site of this scale should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy, with reuse (as indicated in Policy NZ3) one of the key considerations for developments at this scale.</p> <p>Anglian Water welcomes the policy requirement for a comprehensive masterplan for the entire allocation, and that this should be developed in collaboration with the Council and relevant infrastructure providers.</p> <p>Site allocation PP34 is within West Bergholt WRC catchment. The WCS, section 8.13 identifies that there is currently no dry weather flow capacity at the WRC to accommodate future growth and no growth scheme has been identified for delivery in AMP8 (2025-2030). As required by the policy, development would need to be phased for delivery to align with future investments in subsequent AMPs. The Environment Act 2021 has made the preparation of DWMPs by water and sewerage companies a statutory requirement, and DWMP28 (2030-2055) will be prepared under updated guidance published in May 2025, based on lessons learned from the first cycle of plans and the legal requirements now in place. This next DWMP must set out how we will manage and develop our drainage and sewerage systems to meet our obligations under Water Industry Act 1991. As with the WRMP, this includes understanding how to deal with challenges such as asset health, climate change, and population growth. Using this information, we will conduct a risk assessment for three different timescales: the short- (5yr), medium- (15yr) and long-(25yr +) term. The outputs from these allow us to develop 'best value' investment solutions to meet our obligations.</p>

<p>Policy PP35: The Old School, Great Horkesley</p>	<p>Anglian Water supports the policy criteria f, g, and h - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks (criterion e). It is expected that this site should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy.</p> <p>See comments relating to West Bergholt WRC set out in Policy PP34.</p>
<p>Policy PP36: Land at Earls Colne Road, Great Tey</p>	<p>Anglian Water supports the policy criterion i to ensure that there is wastewater treatment capacity at the WRC (Great Tey).</p> <p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity more generally to include our wastewater network. We would request that these policy criteria, to mirror those in other Local Plan policies, are included in Policy PP36 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors.</p> <p>We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>The site is opposite our Great Tey water site, and there are existing Anglian Water assets (water mains) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply infrastructure. <p>Site allocation PP36 is within Great Tey WRC catchment. The WCS, section 8.9 identifies that there is currently some dry weather flow capacity at the WRC to accommodate future growth but insufficient to address the full quantum of growth identified in the Local Plan. No growth scheme at Great Tey WRC has been identified for delivery in AMP8 (2025-2030).</p> <p>As required by the policy, development may need to be phased for delivery to align with future investments in subsequent AMPs. We would advise the</p>



	<p>developers to engage with Anglian Water to determine whether sufficient capacity exists when the development is planned to come forward.</p> <p>The Environment Act 2021 has made the preparation of DWMPs by water and sewerage companies a statutory requirement, and DWMP28 (2030-2055) will be prepared under updated guidance published in May 2025, based on lessons learned from the first cycle of plans and the legal requirements now in place. This next DWMP must set out how we will manage and develop our drainage and sewerage systems to meet our obligations under Water Industry Act 1991. As with the WRMP, this includes understanding how to deal with challenges such as asset health, climate change, and population growth. Using this information, we will conduct a risk assessment for three different timescales: the short- (5yr), medium- (15yr) and long-(25yr +) term. The outputs from these allow us to develop 'best value' investment solutions to meet our obligations.</p>
<p>Policy PP37: Land north of Park Lane, Langham</p>	<p>Anglian Water supports the policy criteria e, f and g - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. We further support policy criterion o, which identifies specific infrastructure needs including water supply and wastewater infrastructure.</p> <p>We recognise that this is a significant site in a location where our network and WRC capacity have been matters for concern locally. These policy measures are important and necessary, to ensure that the development comes forward in a way that ensures the environment and the existing community are not adversely impacted, and infrastructure can be delivered to align with the appropriate phasing of the site. See comments relating to Langham WRC set out in Policy PP26.</p> <p>New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that a strategic site of this scale should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy, with reuse (as indicated in Policy NZ3) one of the key considerations for developments at this scale. We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>Anglian Water welcomes the policy requirement for a comprehensive masterplan for the entire allocation, and that this should be developed in collaboration with the Council and relevant infrastructure providers.</p>

<p>Policy PP38: Land opposite Wick Road, Langham.</p>	<p>Anglian Water supports the policy criteria g, h and i - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. See comments relating to Langham WRC set out in Policy PP26.</p> <p>New developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that this site should ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy. We request a clause is included to state: Development must not discharge surface water to the foul water network.</p>
<p>Policy PP39: Land at The Furze, Layer de la Haye</p> <p>And</p> <p>Policy PP40: Land West of the Folley, Layer de la Haye</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity more generally to include our wastewater network. We would request that these policy criteria, to mirror those in other Local Plan policies, are included in Policy PP39 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors.</p> <p>We request a clause is included to state: Development must not discharge surface water to the foul water network.</p> <p>As indicated in the WCS, section 8.11, it is calculated that there is dry weather flow capacity at Layer de la Haye WRC for the quantum of growth proposed to come forward in the Local Plan. However, the developer would be advised to engage with Anglian Water to assess a sustainable point of connection into the sewer network - including appropriate clauses in the policy.</p>
<p>Policy PP41: Rowhedge Business Park, Rowhedge</p>	<p>Anglian Water supports the policy criteria h, i and j - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. See comments relating to Colchester WRC set out in our response to other policies.</p> <p>Clause h could be updated as there are no combined sewers in this location, and we would expect foul and surface water flows to be separated. We request that the wording is amended to: Development must discharge attenuated surface water to a receiving waterbody. No discharge of surface water will be made to the foul water network.</p>
<p>Policy PP42: Land at White Hart Lane, West Bergholt</p>	<p>Anglian Water supports the policy criteria for these sites to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency,</p>

<p>Policy PP43: Land North of Colchester Road, West Bergholt</p> <p>Policy PP44: Land off Colchester Road, West Bergholt</p>	<p>and ensuring there is wastewater treatment capacity through phasing requirements where necessary. See comments relating to West Bergholt WRC under Policy PP34.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks. It is expected that this site should have the means to ensure that surface water is attenuated and discharged in accordance with the drainage hierarchy.</p> <p>Policy PP44: There are existing Anglian Water assets (sewers) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.
<p>Policy PEP11 Land at Pattens Yard, West Bergholt</p>	<p>Anglia Water notes that whilst the site is adjacent to the West Bergholt WRC catchment, there are no gravity sewers or sewer connections currently serving the existing employment site at Pattens Yard, and no surface water sewer network nearby. It is considered that wastewater treatment and surface water run-off will be managed on site in accordance with the policies in the Plan and any discharge permits required from the Environment Agency.</p> <p>There are existing Anglian Water assets (water main and rising main) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply and sewerage infrastructure.
<p>Policy PP45: Land off New Road, Aldham</p> <p>And</p> <p>Policy PP46: Land at Birch Green, Birch</p>	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity more generally to include our wastewater network. Whilst the WCS indicates there is dry weather flow headroom within the respective WRC catchments, we would request that these policy criteria, to mirror those in other Local Plan policies, are included in Policy PP45 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to various factors.</p> <p>We request the following clause is included in the policies: Development must not discharge surface water to the foul water network.</p>

	<p>There are existing Anglian Water assets (water main) within the site boundaries. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p> <ul style="list-style-type: none"> • the safeguarding of suitable access for the maintenance of existing water supply infrastructure.
Policy PP47: Land at Picketts Farm, Fingringhoe	<p>Anglian Water supports the policy criteria g, h and i - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. See comments relating to Fingringhoe WRC set out under Policy PP25.</p> <p>We request the following clause is included in the policies: Development must not discharge surface water to the foul water network.</p>
PP48: Kelvedon Road, Messing	<p>Anglian Water notes there are no policy criteria to ensure that future development proposals can mitigate both flood risk and pollution risks, manage surface water run-off through SuDS, improve water efficiency, and ensure there is wastewater treatment capacity through phasing requirements where necessary. We would request that these policy criteria to mirror those in other Local Plan policies, are included in Policy PP22 to ensure a consistent approach to site allocations, and to recognise that network and WRC capacity is dynamic and can change over time owing to a range of factors. See comments in relation to Tiptree WRC set out under Policy PP19.</p> <p>We agree that new developments must provide adequate drainage for both foul and stormwater in separate networks.</p>
Policy PP49: Land at St Ives Road, Peldon	<p>Anglian Water supports the policy criteria i, j and k - to ensure that both flood risk and pollution risks can be avoided through appropriate mitigation to manage surface water run-off through SuDS, improving water efficiency, and ensuring there is wastewater treatment capacity through phasing requirements where necessary. See comments relating to Fingringhoe WRC set out under Policy PP25.</p> <p>We request the following clause is included in the policies: Development must not discharge surface water to the foul water network.</p> <p>There are existing Anglian Water assets (sewer) within the site boundary. As indicated for PP1, Anglian Water requests the inclusion of policy wording below - or the alternative suggested approach regarding reference in the supporting text and a general policy requirement to safeguard access to our assets within Policy NZ3.</p>

	<ul style="list-style-type: none">• the safeguarding of suitable access for the maintenance of existing sewerage infrastructure.
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4. Conclusion

- 4.1. Anglian Water Anglian Water welcomes the opportunity to contribute comments on the Draft Local Plan for Colchester City Council. We consider that the Plan is well set out with in relation to managing flood risk, surface water and wastewater, and enabling water efficiency. We recognise the challenges for meeting the uplift in housing requirements and the infrastructure required to help deliver future growth across the district, with the main focus being Colchester and the larger towns.
- 4.2. We have raised some policy matters relating to consistency between policies addressing surface water flood risk, water supply, and wastewater, and how these matters are attributed to site allocation policies.
- 4.3. We look forward to continuing our positive and proactive discussions with the Council in respect of our comments and the next iteration of the Local Plan, including supporting updates to the evidence base if required.