



Representation Form

Consultation on additional evidence base documents, September 2023

Closing date for submitting representations: 11:59pm, Friday, 20th October 2023

Part A

Section 1: Personal Details

Title:	
First Name:	Tessa
Last Name:	Saunders
Job Title (where relevant):	Spatial and Strategic Planning Manager
Organisation (where relevant):	Anglian Water
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Section 2: Agent Details (if applicable)

Please supply the details below of any agent you have working on your behalf.

Agent name:	
Address:	
Postcode:	
Telephone number:	
Email:	

Part B

Please fill in a separate form for each document

Section 3: Representations

Which Document are you responding on?

Examination Library ref	Document name	Paragraph No(s)
F51	West Winch Topic Paper	See Comments

Summary of Comments:

Please be as precise as possible as to why you support or object to the evidence and/or any suggested main modifications to the Plan contained in the document, providing the relevant paragraph and/or policy number for each point.

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.

Anglian Water is the statutory water and sewerage undertaker for the Borough Council area and seeks 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.

F51 WEST WINCH TOPIC PAPER

Paragraphs 92 – 94: Anglian Water supports the preparation of the Flood Risk and Surface Water Drainage Strategy and the series of recommendations to manage surface water run-off within and surrounding the site, particularly the focus on sustainable drainage systems (SuDS) and utilising the hierarchy for surface water discharge, which avoids connection to our network.

F51g - Appendix 7 Flood Risk Assessment and Surface Water Drainage Strategy: It is noted that Anglian Water is referenced in the strategy in terms of adoption and maintenance of surface water drainage and SuDS features. We have clear guidance on the design and adoption of SuDS on our website <https://www.anglianwater.co.uk/developing/drainage-services/sustainable-drainage-systems/>

The strategy does not directly suggest or recommend that any surface water attenuated on site (as opportunities for infiltration are limited due to the ground/soil conditions) for reuse to

enhance the sustainability of the West Winch Growth Area. As the proposed quantum of growth for West Winch may be built out over two decades, the impacts of climate change will continue to affect water resources and sensitive water environments, we therefore consider that future proofing is essential and the opportunities a site of this scale presents in terms of rainwater/stormwater harvesting and reuse is considerable when linked to sustainable drainage systems proposed to manage surface water run-off across the site. However, we do note that the recommendations in the report (replicated in paragraph 93 of the Topic Paper) include seeking opportunities to incorporate SuDS source control features that offer complementary benefits including for water quantity and water quality.

Our [Water Resources Management Plan 2025-2050](#) (revised draft WRMP24) plans for the supply of drinking water over the next 25 years, with an overarching aim to reduce the amount of public water supply in England per person by 20% by 2038, with an end goal of 110 litres per person per day (l/p/d) across the region. To attain this average means that new properties need to be built to deliver below 110 l/p/d - to at least 100 l/p/d and in some areas 80 l/p/d.

Housing growth and the expansion of business generates new demands for water. On average growth (through Local Plans and on unallocated sites through planning permissions) has meant that the number of homes increases by about 1% per year. Unconstrained water demand would increase by 138 Ml/d due to the additional 0.911million new customers being planned for up to 2050. If there is insufficient water, then demand management options including reducing leakage are required. Our current WRMP19 for 2020 to 2045 means AWS investment will have reduced leakage by 15% by 2025. We have the lowest level of leakage in the water sector at some 15% of total water demand – which includes customer supply pipe leakages. If demand management is insufficient to close the water supply demand gap, then water companies are required to propose supply side options. WRMP24 is the ‘best value plan’ and so balances environmental performance with customer’s expectations and the level of water bills. Supply options include water reuse - treated water from water recycling centres that can be used directly for irrigation, for example, or increasing flows in rivers so it can be abstracted downstream. The two proposed reservoirs in the Fens and Lincolnshire are designed to meet the supply-demand gap with other options including strategic transfers.

We agree and support government plans and the calls from the Environment Agency and Natural England to reduce the amount of water taken from sensitive environments through abstraction. This therefore means that to have sufficient water we must first seek to reduce the amount of water new homes and businesses use. This reduction in demand is both in the operation/ use of developments and in the construction of the new buildings and infrastructure and services which support them. We therefore have an existing Joint Protocol in place with the Environment Agency and Natural England which supports Councils having a policy of 110 litres per day per person for new homes. This Protocol is currently in the process of being updated to go to at least the 100 litres per person per day target for new homes announced in January 2023 by Government in the Environment Improvement Plan for water stressed areas, and supporting local planning authorities that seek to go further in their ambitions for water efficiency.

We therefore suggest that the Proposed Main Modifications (in red text) could be strengthened as follows:

Part A Criterion 15:

Incorporation of Sustainable Drainage Systems (SuDS) to address surface water run-off, flood risk, biodiversity, and the avoidance of groundwater pollution, and opportunities for integrated water management measures. SuDS should manage overland surface water flow and include features such as green/ blue infrastructure, developed in accordance with the Conceptual Surface Water Drainage Strategy and in consultation with the LLFA.

[Our suggested amendments in blue text]

Part A Criterion 16

Whilst we welcome the aim of the New Criterion within which states: "buildings adaptable to climate change, to minimise impacts on people and property" we consider this is ambiguous and does not provide a sufficient policy test to promote more ambitious levels of water efficiency and opportunities for reuse - e.g. non-potable water supplies for flushing toilets and irrigation of gardens/green spaces.

As the largest allocation within the new Local Plan, we suggest that water efficiency measures are more ambitious and should as a minimum meet 100 l/p/d with integrated water management measures such as rainwater/stormwater harvesting, and reuse linked to SuDS so that even greater efficiencies for potable water use can be realised across the development.

Justification for additional growth – Paragraph 129

Anglian Water would welcome certainty in the new Local Plan on the overall size of the West Winch Growth Area, as this will allow us to plan an effective strategy for the water and wastewater infrastructure required for the site, avoid abortive work, and help us achieve carbon efficiencies in providing the right type and size of infrastructure at the outset.

Our long-term ambitions include becoming a net zero business by 2030 for our operational carbon, and a reduction of 70% for our capital carbon against a 2010 baseline. Our carbon calculations show that new developments that serve over 5,000 population equivalent or over 2,000 homes can achieve significant carbon efficiencies for capital and operational carbon (up to four times more carbon efficient) in terms of our infrastructure provision, compared to developments with a lower quantum of homes.

Please note you should cover succinctly all the information, evidence and supporting information necessary to support/justify your comments.

Section 4: Examination Hearings

This consultation may be followed by further Examination Hearing sessions, at the discretion of the Planning Inspectors. Do you consider it necessary to participate in Examination Hearing sessions? (Please select one answer)

No, I do not wish to participate at the Examination Hearing

Yes, I wish to participate at the examination hearing

Section 5: Data Protection

Do you wish to be notified further about the Local Plan Examination process, at any of the following stages?

Schedule of Main Modifications stage (following hearings)

Yes

No

Publication of Inspector's Report

Yes

No

Adoption of Local Plan

Yes

No

In complying with the General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, King's Lynn and West Norfolk Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to this consultation on the Borough Council's website. However, it should be noted that all personal information (except for names and organisation name, where appropriate) will not be published.

When you give consent for us to process data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent, you must notify us at lpr@west-norfolk.gov.uk or 01553 616200.

Section 6: Signature and Date of Representation

Please sign and date below:	
Signature: (electronic signatures are acceptable)	<i>Tessa Saunders</i>
Date:	20/10/2023

Please note that, to be considered, your representation will need to be received by 11:59pm on Friday, 20th October 2023.