

Anglian Water Consultation Response

B&MSDC SPD Draft – Intensive Livestock & Poultry Consultation

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, above and 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 Babergh and Mid Suffolk District Council and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water wants to proactively engage with the plan-making 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 Intensive Livestock and Poultry SPD

- 3.1. Anglian Water welcomes the introduction of this supplementary planning document (SPD) following the adoption of the Part 1 Joint Local Plan, to provide further guidance on the implementation of Policy LP14, particularly regarding water resources and water quality. Anglian Water is the statutory water provider (together with Essex & Suffolk Water) across both districts, and we have several water abstraction locations, which are sensitive receptors to water quality issues.
- 3.2. Anglian Water's East Suffolk WRZ covers an area of 1241 sq. km and extends inland from Stour, Orwell and Deben estuaries and includes the supply systems for Ipswich, Felixstowe, Hadleigh, Stowmarket and Woodbridge. Supplies in the WRZ are obtained from a combination of sources that include groundwater abstracted from the Suffolk and Essex Chalk aquifers and surface water which is pumped from the River Gipping into Alton Water reservoir.
- 3.3. Our revised draft Water Resources Management Plan (October 2023) recognises that non-household demand for water resources continues to grow and the efficient use of water in this sector is becoming increasingly important. Non-household consumption accounts for

approximately 27% of our overall demand. This demand is difficult to forecast due to lack of visibility of developers' plans as well as the variability of the wider socio-economic environment we operate in, which is in considerable flux. Identifying the timing and scale of new non-household requirements for water is still a problematic area, as requests for large volumes of water can significantly impact the supply/demand balance.

- 3.4. As a result, Anglian Water can no longer guarantee to supply non-domestic water requirements for intensive/high water consumptive uses such as manufacturing/ food processing and production. Our regulatory position means we are unable to supply new non-domestic demands if this jeopardises domestic supplies for existing and new residential customers and businesses. As a result of limited water availability, we are undertaking more modelling and decisions on non-household growth looking at available headroom in the water resource zones. We are looking to work together with new or expanding non-household users that are requesting significant non-domestic water supplies to find solutions such as opportunities for water recycling, reuse, and final effluent reuse. Longer term supply options are dependent on bringing forward two new reservoirs in Lincolnshire and Cambridgeshire, among other options such as desalination and water reuse.
- 3.5. **Para 1.4:** We support the identification of ground water protection and drinking water abstraction points as sensitive land uses and environments, where particular care would need to be undertaken when locating pig and poultry farms due to potential pollutant impacts. In our region, we face significant challenges when addressing raw water quality and ensuring improvements are made both for the environment and the water we treat for our customers. Pollutants such as nitrates, phosphates and pesticides can end up in groundwater aquifers and watercourses as a result of activities such as private discharges (point source pollution) and agricultural practices (diffuse pollution). This can often cause harm to the aquatic environment such as eutrophication, as well as posing challenges to our reservoirs that receive direct input of river flows.

5.4: c) consider and address the impact of water resources and the capacity of the water supply infrastructure network

- 3.6. **Para 5.4.1:** We welcome the recognition of the demand constraints for future non-domestic water supplies to non-household customers within the Anglian Water region. We would request that the following sentence in the paragraph is amended to read:

"Water Resource Zones within the The Anglian Water Resource Zones region also has have constraints in terms of available headroom for **non-domestic** water resource requests".

- 3.7. **Para 5.4.3:** We note the reference to unsustainable water usage in vulnerable groundwater areas which reflects the Environment Agency's Restoring Sustainable Abstraction (RSA) programme, Water Framework Directive River Basin Management Plan objectives, and long-term sustainable abstraction ambition (National Framework for Water Resources), together

with other legislative requirements. These environmental measures result in abstraction reduction and capping of abstraction licence quantities for both water companies and private abstractors to enable more water to be left in sensitive environments.

- 3.8. Anglian Water recognises that all our abstractions must be environmentally sustainable. We have and continue to address issues where our abstractions have the potential to cause environmental problems or risks, through our Water Industry National Environment Programme (WIINEP). In our region, we have a significant part to play with the largest WIINEP plan of any water company, totalling at £800 million across schemes such as sustainable abstraction, river restoration and improving water quality in AMP7 (2020-2025). Our revised draft WRMP24 identifies how we will continue to meet our sustainable abstraction objectives; aligned with ensuring the security of water supply is not compromised.
- 3.9. **Para 5.4.4:** Anglian Water supports the requirement of a Water Supply Management Statement/Water Resource Assessment to be approved by the local planning authority, in consultation with the relevant water company and the Environment Agency. This will enable us to assess whether there is sufficient headroom available to supply the identified demand for non-domestic water supply, and whether identified water efficiency and integrated water management measures have adequately addressed reductions in overall demand.
- 3.10. **Para 5.4.5:** We note the specific requirements of the methodology to be employed in the Water Resources Assessment, and we are supportive of measures that would demonstrate water neutrality.
- 3.11. **Para 5.4.6:** We agree that water resources from all sources should be accounted for in the Water Resource Assessment, including private boreholes (noting that abstraction from a surface or underground water source of up to 20m³/day can be undertaken from the same source without an abstraction licence) and agricultural reservoirs.

4. Conclusion

- 4.1. Anglian Water welcomes the opportunity to comment on the draft Intensive Livestock and Poultry SPD for Babergh and Mid Suffolk district councils. We are broadly supportive of the key objectives of this additional guidance, particularly regarding the requirements for the sustainable use of water resources and ensuring adequate measures for protecting water quality.