

**Statement of Common Ground between  
Ipswich Borough Council as Local Planning Authority**

**and**

**Anglian Water Services Limited**

**4 June 2020**

**Scope**

1. This Statement of Common Ground identifies areas of agreement between Anglian Water Services Limited (AWS) and Ipswich Borough Council (IBC) in relation to the Final Draft Ipswich Local Plan.
2. AWS submitted a series of comments regarding the Final Draft Ipswich Local Plan. However, these were submitted during the consultation period but received by the Council after the end of the formal consultation period and therefore could not be formally accepted as representations. Consequently, whilst not officially representations, as a statutory consultee and in the spirit of the duty to cooperate, IBC have engaged with AWS to agree on our positions on certain policies and sites within the Final Draft Ipswich Local Plan.

**Objective**

3. The objective of this Statement of Common Ground is to secure agreement between the parties to set out the areas of agreement and those of disagreement in relation to water supply and wastewater systems.

**Background to Ipswich Water Supply and Wastewater Systems**

4. Ipswich is located in the East Suffolk Water Resource Zone (WRZ). The WRZ is within an area of serious water stress and this is reflected in the AWS Water Resource Management Plan (WRMP) (December 2019) which highlights that options to develop new sources of water are limited.
5. A growing population, climate change and the need to support the achievement of environmental objectives are placing increased pressures on existing water resources mean that for AWS, a forecast deficit in the supply demand balance needs to be addressed. AWS have set out a range of ambitious water efficiency and leakage management schemes to counter rising demand. Despite these steps, Anglian Water Services have identified a need for significant investment in regional water supply infrastructure to enable the transfer of water from areas of surplus to areas facing a deficit including East Suffolk WRZ.
6. IBC, in partnership with Suffolk Coastal District Council (now East Suffolk), prepared a joint Water Cycle Study for the two administrative areas. The conclusion of this study was that there is sufficient flow capacity at the Cliff Quay Water Recycling Centre (WRC) to cope with the anticipated level of growth in Ipswich over the plan period. Anglian Water's Water Recycling Long Term Plan (Sept 2018) identified a need for further investment relating to biological capacity at Cliff Quay WRC. Anglian Water's investment is dependent upon the outcome of the business plan and decisions made by Ofwat as their economic regulator. The

need and timing of any investment will be kept under review by AWS working with IBC and a range of stakeholders.

#### Evidence Base

- The evidence base for water supply and wastewater systems consists of the Water Cycle Study (January 2019) together with Anglian Water's Water Resource Management Plan 2019 and Water Recycling Long Term Plan 2018.

#### Anglian Water Services Comments on the Final Draft Ipswich Local Plan

- AWS submitted a series of comments regarding the Final Draft Ipswich Local Plan which were not received within the consultation period.

Table 1 AWS Comments, Regulation 19

Comment No.	Policy/Chapter	Comment	Change required
1	ISPA2: Strategic Infrastructure Priorities	Anglian Water supports Policy ISPA2 which identifies strategic priorities for infrastructure provision within the Borough and collaboration with utility companies including Anglian Water to its delivery. We also note that an amendment to ISPA2 has been made in response to Anglian Water's previous comments which is welcomed.	N/A
2	CS17: Delivering Infrastructure	Anglian Water is supportive of Policy CS17 as it states that planning permission will only be granted where developments meet the need for on-site and off-site infrastructure (including utilities) to support the development.	N/A
3	DM1: Sustainable Construction	Policy DM1 refers to residential developments being required to minimise water consumption by meeting the optional requirement of 110 litres/per person/per day. Anglian Water and the Environment Agency has issued advice to local planning authorities (copy attached) stating that there is evidence to demonstrate a need for optional water efficiency standard to be applied in the Anglian Water supply area. As such we fully support the inclusion of this standard in the policy. Reference is made to this optional higher water efficiency standard being met unless it can be demonstrated unless it is not feasible or viable. The cost of the optional higher water efficiency standard can be as low as £6-9 per dwelling. We therefore consider that this does not make the Ipswich Local Plan, or individual development proposals, unviable. Similarly, we fully support the cross reference to the requirements of Policy DM4 in relation to	N/A

		the provision of Sustainable Drainage Systems and water efficiency measures.	
4	DM4: Flood Risk	<p>Anglian Water is supportive of Policy DM4 as it requires that planning permission will only be granted where it can be demonstrated that foul water treatment or disposal already exists or can be provided in time to serve the development.</p> <p>We also support the requirement to use SuDs and that the disposal of surface water to combined or surface water sewers will only be considered where it is demonstrated that there are no reasonable alternatives. This is consistent with the surface water hierarchy and would help to ensure that new development does not increase the risk of surface water and sewer flooding.</p> <p>Opportunities for a more holistic and integrated approach to water management should form part of the plan, to encourage multi-functional water management assets which support other community objectives. This approach combines different elements of water management (e.g. combining SuDS with a water re-use system to both manage runoff and provide an alternative non-potable water supply) together with town planning and design (e.g. integrating the planted SuDS features throughout a development to contribute to 'greener' streetscapes).</p> <p>For the reasons set out above we fully support the reference made to development proposals incorporating water re-use measures wherever possible to reduce demand on existing water supply.</p>	N/A
5	DM18: Amenity	<p>We note that Policy DM18 has been amended to clarify that new development that would adversely affected the continued operation of established uses will not be permitted.</p> <p>Anglian Water welcomes the changes that have been made in response to our previous comments and supports the policy as currently drafted.</p>	N/A
6	SP2: Land allocated for housing	<p>Policy SP2 as drafted requires development proposals to take account of site constraints as outlined in Appendix 3 site sheets.</p> <p>There is existing Anglian Water infrastructure within the boundary of a number of the allocated housing sites. However the text of Appendix 3 does not refer to Anglian Water's existing infrastructure.</p>	<p>Add new paragraph to text to read:          "There are [existing foul and surface water sewer(s)] [delete as appropriate] in</p>

		<p>We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required. It is therefore suggested that reference be made to Anglian Water’s existing infrastructure where relevant.</p>	<p>Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. 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. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.” (see appendix 1 of this Statement of Common Ground for a list of sites that require amendment)</p>
<p>7</p>	<p>SP4: Opportunity Sites</p>	<p>Policy SP4 as drafted requires development proposals to take account of site constraints as outlined in Appendix 4 site sheets. There is existing Anglian Water infrastructure within the boundary of site IP045. However the text of Appendix 4 does not refer to Anglian Water’s existing infrastructure. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.</p>	<p>Add new paragraph to text to read: “There are existing foul and surface water sewers in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing</p>

		<p>It is therefore suggested that reference be made to Anglian Water's existing infrastructure for site IPO45 in Appendix 4.</p>	<p>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. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required."</p>
8	Site IPO67a & b	<p>We note that it is proposed allocate site reference IPO67a and b for both housing and employment.</p> <p>The above sites are located adjacent to Cliff Quay Water Recycling Centre (WRC) in the ownership of Anglian Water. Nuisance may be caused by noise, lighting and traffic movements but its most prevalent source will be odours, unavoidably generated by the treatment of sewerage.</p> <p>Where it is proposed to develop sites within proximity of the water recycling centres there is a need to consider further the odour impact and the extent to which housing and employment uses could be accommodated on the sites without having an adverse impact on future residents and occupiers of these sites.</p> <p>From an initial asset encroachment risk assessment we consider that site IPO67a will be exposed to odour emissions from the WRC operation. The anticipated level of exposure would restrict the amenity of the residential development and could effect the continuous operation of Cliff Quay WRC.</p> <p>Employment uses (excluding office uses) on site IPO67b may be acceptable subject to the design and layout of the site and the distance which is maintained from Cliff Quay WRC.</p>	Delete IPO67a as a residential allocation.



## Areas of Agreement

9. The parties to this Statement of Common Ground agree that:
  - 9.1 The support for policies in the Core Strategy and Development Management Policies Development Plan Document (comments 1 – 5) is noted.
  - 9.2 The request for further explanatory text regarding the identification of AWS assets in the site sheets listed in appendix 1 (comment 6) is agreed.
  - 9.3 The request for further explanatory text regarding the identification of AWS assets in the site sheet for IP045 (comment 7) is agreed.
  - 9.4 The principle of an employment allocation at IP067b (excluding office use) is agreed (comment 8). It should be noted that Policy SP5 of the Site Allocations Development Plan Document, and the accompanying site sheet, already states that office uses are excluded. Therefore, no amendment to this specific policy or site sheet is necessary.

## Area of Disagreement

### IBC Position

- 10.1 IBC does not agree that the residential allocation at site IP067a should be deleted (comment 8). IBC acknowledges that the site is in close proximity to the AWS Cliff Quay WRC. The site is approximately 200m at its closest point to the boundary of the WRC. However, there are residential properties immediately to the east of site IP067 at Pipers Vale Close which are also approximately 200m from the boundary of the WRC.
- 10.2 In addition, the site sheet for IP067a highlights the constraint of odour from the WRC and also indicates that housing should be at the northern-most end of the site. These criteria would help steer any dwellings away furthest away from the WRC. It would be expected that less sensitive uses such as habitat creations to meet biodiversity net gain and landscaping would then be sited adjacent to the southern edge to occupy this remaining space.
- 10.3 It is however acknowledged that the site sheet could be more explicit about the need to minimise impacts on future occupiers from potential WRC odour. Therefore, IBC propose that the following additional text is inserted into the site sheet:

“Site IP067a is approximately 200m away from the boundary of the Cliff Quay Water Recycling Centre. Future residential development of this site will need to ensure that future occupiers are adequately mitigated from any odour disturbance arising from this nearby source. It is recommended that the site layout of any development takes account of this, for example by positioning sensitive uses further north of the site and utilising the southern section of the site for non-sensitive uses such as landscaping and habitat creation/ enhancement. Other means of mitigation may be necessary and consultation with Anglian Water will be required as part of any future application.”

### AWS Position

- 10.4 Cliff Quay Water Recycling Centre (WRC) is an essential sewage treatment facility which serves the Ipswich sewerage catchment and which is critical to accommodating the

future growth of Ipswich. Therefore, development proposals particularly housing development should not place limitations on the continuous operation of this site and future investment by Anglian Water for our customers.

- 10.5 Anglian Water has consistently raised concerns about the suitability of this site for residential development due to the proximity to Cliff Quay Water Recycling Centre which is essential infrastructure supporting the current and future population of Ipswich.
- 10.6 No further evidence has been provided by Ipswich Borough Council to demonstrate that the anticipated amenity impacts from odour relating to the normal operation of Cliff Quay WRC can be avoided. Our position remains that residential development on Site IP067a is unsuitable and inappropriate for the reasons set out below:
- 10.7 Site IP067a forms part of a larger site which is currently allocated for employment uses excluding offices in the adopted Local Plan. It is proposed to be allocate the northern part of the site for residential use.
- 10.8 Anglian Water has highlighted the proximity of Site IP067a which is proposed for housing to Cliff Quay Water Recycling Centre (WRC) and raised concerns about whether a suitable standard of residential amenity can be demonstrated.
- 10.9 We have undertaken odour dispersion modelling for a number of our Water Recycling Centres including the Cliff Quay site. The odour dispersion modelling identifies the  $30U_E/m^3$  dispersion contour, which is the widely accepted benchmark for residential development, extends between 300 and 370m from the northern boundary of Cliff Quay Water Recycling Centre. At this range site IP067a would be considered to be unsuitable for residential use.
- 109.10 In addition the most odorous elements of a WRC process include the inlet works, primary settlement and sludge treatment. At Cliff Quay WRC all of these elements are located within the northwest portion of the Cliff Quay WRC site.



Signatures

Signed K. Meobald

Name KATE MEOBALD

Position LAWYER

Date 4th June 2020

Ipswich Borough Council

Signed 

Name .....Stewart Patience

Position .....Spatial Planning Manager

Date .....3rd June 2020.....

Anglian Water Services Limited

**Appendix 1 – List of Site Sheets that require amendment**

<b>Site name</b>	<b>Existing infrastructure</b>
IP045	Foul sewers
IP003	Foul sewer
IP004	Surface water sewer
IP009	Foul sewer
IP010b	Foul sewer
IP014	Foul sewer
IP015	Surface water sewer
IP031a	Foul sewer
IP032	Sewer
IP033	Surface water sewer
IP047	Surface water sewers and discharge point
IP048a	Foul and surface water sewers
IP048b	Foul sewer
IP051	Foul sewer
IP066	Foul sewer