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To: Policy
Cc: Langlois Stephen
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Follow Up Flag: Follow up
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Categories: Green Category

We are committed to working with Maldon and key stakeholders to enable sustainable growth to come forward in the district . Anglian Water welcome the opportunity to comment on the draft plan and rely on the long term visibility through the Local Plan to enable us to plan for water recycling (previously referred to as wastewater) infrastructure.

We support the objectives within the plan particularly objectives 1,7, and 12 with a strong emphasis on sustainability throughout the plan.

We are encouraged by and are supportive of the direction of growth in sustainable locations with existing available water recycling capacity. We believe growth in areas of existing capacity is the preferred approach as opposed to locations where significant investment is needed and environmental constraints would need to be overcome . Environmental impact has to be a significant consideration. Where investment in water recycling is needed to provide for growth this is funded through our business plan that is produced every five years and is subject to approval by our regulator, OFWAT. Ultimately the cost of investment is borne by our existing customers through their water and wastewater bills. Anglian Water's Strategic Direction Statement (<https://www.anglianwater.co.uk/assets/media/strategic-direction-statement.pdf>) sets out our commitment to sustainability, mitigating the effect of climate change and minimising our carbon footprint whilst providing water and wastewater services to our existing and future customers at an affordable price.

We offer a pre development service to developers and would encourage prospective developer to contact us at the earliest opportunity to discuss drainage requirements to serve their proposal. Details can be found at:

<http://www.anglianwater.co.uk/developers/planning/>

Strategic Growth Locations

We are pleased to work with all parties in the preparation of Masterplans for the Garden Suburbs at Maldon and Heybridge and we are currently liaising with the developers to provide a satisfactory foul drainage strategy.

We support Policy S4 Maldon and Heybridge Strategic Growth, Policy S6 Burnham on Crouch Strategic Growth that stipulates 'adequate provision is made for enhanced and comprehensive sewerage infrastructure'. Although there is reference to flood risk management and surface water mitigation measures , this could go further and give a firmer message on the requirement for a Sustainable Drainage System (SuDS) solution for surface water management. We are pleased to see reference to the Surface Water Management Plan(SWMP).

Surface Water Management

Adequate surface water management is crucial to help Maldon adapt to, and mitigate for, climate change. The National SuDS Standards and Building Regulations Part H set out a clear hierarchy for surface water management, we are keen to see new developments managing surface water through SuDS rather than connecting into the public system.

Policy D5 Flood Risk in the document provide some measures regarding surface water management however these could be strengthened and we would be keen for this to go further and include the following key messages:

1. No new surface water connections to combined and foul sewers.
2. Removal of existing surface water connections from combined and foul systems.
Evidence that the developments had followed the surface water management hierarchy will help to ensure infiltration is considered ahead of maintaining connection to sewers.
3. Understand exceedance of existing and proposed surface water management measures and safeguard/design flow routes reinstating natural pathways, where possible. Should the rainfall extent exceed the capabilities of the surface water systems, this will help to ensure properties are protected and urban design of public open space considers the potential flows of surface water.
4. Development should seek to reduce flood risk to the site and third parties.
5. Early engagement is key to ensuring adequate surface water management measures are included.
6. Particular consideration must be given to development in areas where there is high water table.
7. Maintaining existing surface water drainage features, such as ditches, to ensure there are opportunities for surface water to be disposed of away from sewers.

There is also an opportunity to reduce the overall flood risk in Maldon through re-development. The Policy could address this by ensuring the same design standards that are applied to new developments(greenfield) are also applied to previously developed sites(brownfield).

We recommend the flood risk policy includes a requirement to separate surface water from the foul system in any redevelopment in accordance with the NPPF technical guidance and the surface water management hierarchy in part H of Building Regulations.

3.53 Suggests that areas of risk of flooding should consider flood resilience design measures and SuDS. We would recommend that all development should utilise SuDS as far as possible.

Policy I1 infrastructure and Services

We are supportive of this policy which comprehensively ensures adequate infrastructure is in place to serve development without risk to existing development.

8.5 We are pleased to be recognised as a key partner for the Council on planning issues and in the formulation of the Local Plan and look forward to continued working together to enable the delivery of sustainable development.

To erase any confusion, I would point out that reference is made to the Surface Water Management Plan(page 120) and the Site Waste Management Plan (page 48) and both are using the same abbreviation of 'SWMP'. This needs to be clarified.

Please do not hesitate to contact me should you wish to discuss any element on this response.

Regards

