

**Babergh and Mid Suffolk Joint Local Plan**

**Statement of Common Ground**

**Between**

**Babergh and Mid Suffolk District Councils**

**and**

**Anglian Water**

**and**

**The Environment Agency**

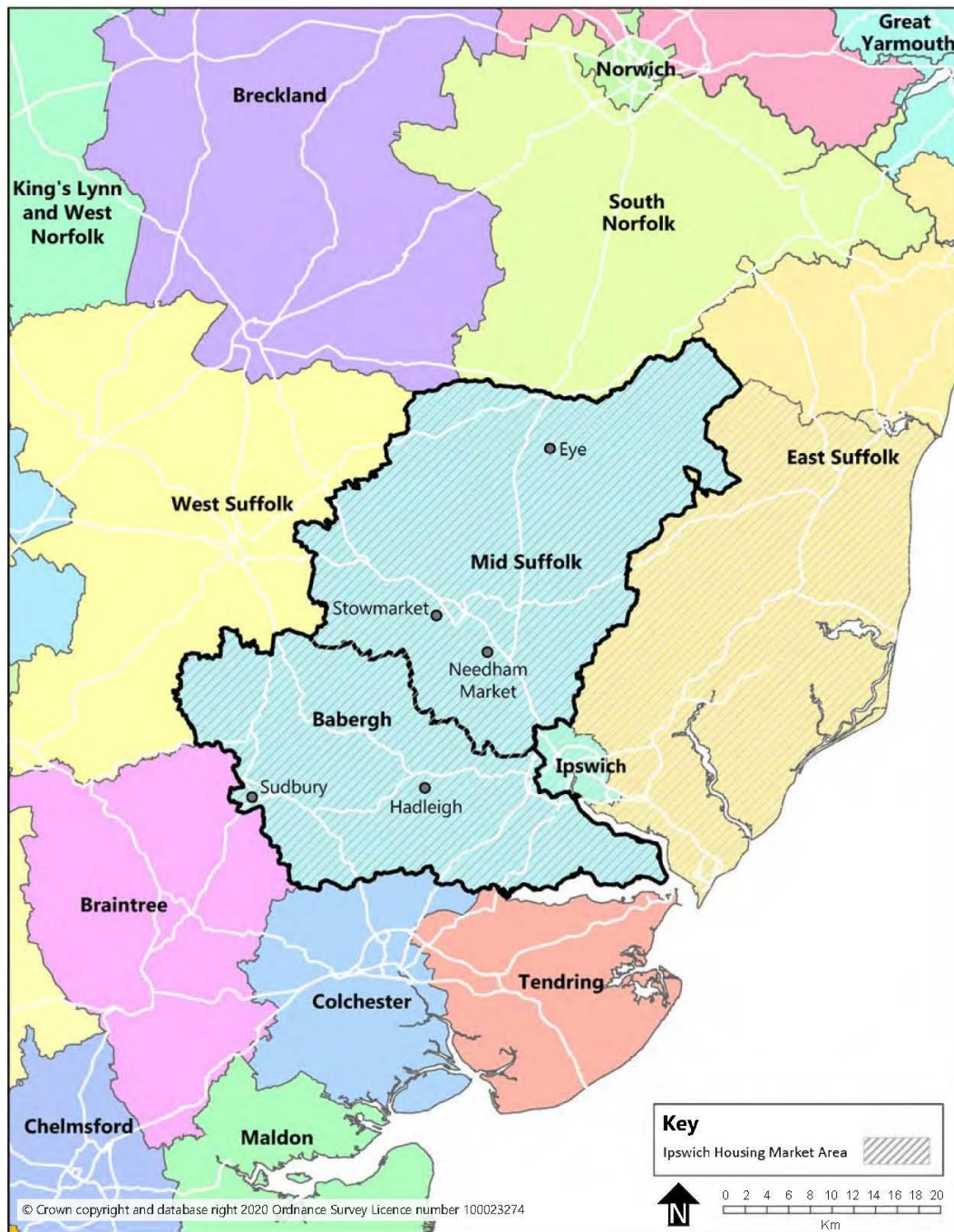
**and**

**Natural England**

**March 2021**

## 1. Areas covered by the Statement of Common Ground

The Statement of Common Ground relates to the area covered by the local planning authorities of Babergh and Mid Suffolk District Councils, who are preparing a Joint Local Plan.



## **2. Signatories to this Statement of Common Ground**

The signatories to this Statement of Common Ground are:

- Babergh District Council;
- Mid Suffolk District Council;
- Anglian Water;
- The Environment Agency; and
- Natural England.

## **3. Purpose and scope of Statement of Common Ground**

To confirm Anglian Water supports the principles of the Babergh and Mid Suffolk Water Cycle Study, in relation to water recycling infrastructure.

That any actions resulting from the Water Cycle Study can be dealt with, working on the actual impact of growth for the identified Water Recycling Centres.

That this approach is considered acceptable to Natural England when considering potential effects on Protected Habitats.

That the Environment Agency support the position set out in this Statement of Common Ground.

## **4. Strategic matters being addressed**

- i) Wastewater.

The Babergh and Mid Suffolk Water Cycle Study considered all potential development sites identified through the plan-making process, coming forward during the Babergh and Mid Suffolk Joint Local Plan period to 2037. Through the production of this Water Cycle Study, environmental constraints have been identified where:

*“A number of protected sites such as SSSIs and Priority Habitats are found within or downstream of the study area that should be carefully considered in future plan making. This is particularly significant for Chantry, Diss, Hadleigh, Halesworth and Mendlesham, where the water quality impact assessment has identified that it would not be possible to mitigate the water quality impacts of the proposed growth.”*

The Water Cycle Study, prior to an addendum being produced, also concluded in respect of the Water Recycling Centres (WRC) for Chantry, Diss, Hadleigh and Halesworth that:

*“...water quality modelling identified a risk that planned growth could cause a deterioration in water quality, and that it may not be possible to mitigate this with treatment at the technically achievable limit. At these works, further mitigation may need to be taken to accommodate growth and options include pumping wastewater to a different WRC or changing the point of discharge to a less sensitive waterbody. Detailed optioneering is beyond the scope of this study and is best undertaken by Anglian Water who have a detailed knowledge of their assets, and the range of options and constraints at each WRC.”*

*“The modelling indicates that treatment upgrades would be required at the majority of WRCs in order to accommodate growth without deterioration in water quality downstream. Extensive engagement with Anglian Water is required in order to*

*understand the phasing of growth with WRC upgrades to ensure capacity and upgrades to treatment processes are aligned. The growth scenario assessed assumes that every development site identified comes forward and so represents a worst case for each wastewater catchment. There may be options to consolidate growth within catchments that have more environmental capacity, and this should be considered alongside the capacity assessment in section 7.”*

An addendum to the Water Cycle Study was subsequently produced based on sites being proposed for development in the Joint Local Plan together with existing planning permissions being accounted for in the Joint Local Plan and the impacts on wastewater treatment capacity, water quality and environmental impact.

The addendum concluded in respect of water quality that deterioration is no longer an issue at Chantry and Hadleigh WRCs. Diss WRC and Brettenham WRCs are not serving any Joint Local Plan allocations and therefore did not require further assessment. Growth in the Mendlesham WRC catchment is unlikely to prevent good ecological status being achieved in the future. At Halesworth WRC and Thurston WRC, the deterioration is reduced below 10% based upon the scale of growth outlined in the Joint Local Plan. In the case of Thurston WRC this can be addressed through treatment at Technically Achievable Limit. Ringshall WRC is a small descriptive works and is unlikely to receive significant flows and alternatives will need to be considered. Anglian Water would determine the appropriate WRC to discharge foul flows to when approached by a developer by connecting to the closest sewer pipe which has capacity to serve the foul flows from a development. The nearest alternatives to the Ringshall WRC are Great Finborough, Stowmarket and Needham Market WRCs.

Early engagement between the Councils and Anglian Water was recommended.

### Outcomes

Babergh and Mid Suffolk District Councils and Anglian Water have discussed this matter.

As mentioned above the addendum to the Water Cycle Study, which is based on sites being proposed for development in the Joint Local Plan together with existing planning permissions being accounted for in the Joint Local Plan, updated the position outlined in the main Water Cycle Study.

Any future investment required to accommodate further growth at existing water recycling centres would normally be identified through business plans prepared through the five-year investment cycle.

The WCS Addendum report has identified there is headroom currently available at Chantry and Halesworth WRCs for all of the growth outlined in the Joint Local Plan within the conditions for dry weather flow set out in the relevant permits for WRCs issued by the Environment Agency. Anglian Water have also identified there is not an immediate need to invest in the Chantry, Hadleigh, Halesworth, and Mendlesham catchments to accommodate the further growth anticipated in the emerging Joint Local Plan in their business plan for AMP 7 (2020 to 2025). Where a risk is presented within AMP 7 then Anglian Water will identify a strategy. The risk of non-compliance and the potential need for investment at all catchments in the Babergh and Mid Suffolk administrative areas to accommodate further growth and for other drivers will be reviewed by Anglian Water. Any catchments identified will be reviewed as part of the Drainage and Wastewater Management Plan currently being prepared with the draft plan expected to be published in Summer 2022 and monitored through an annual review process.

Babergh and Mid Suffolk District Councils have discussed this matter further with Natural England on 28<sup>th</sup> October 2020, who confirm they are satisfied with this approach in respect of any potential effects on Protected Habitats.

**Anglian Water agree they support the principles of the Babergh and Mid Suffolk Water Cycle Study, in relation to water recycling infrastructure. Anglian Water also agree that the scale and timing of growth as set out in the Pre-Submission (Reg 19) Joint Local Plan and the findings for the identified Water Recycling Centres in respect of water quality will be fully considered as part of the business planning process which is used to identify investment for growth and other drivers.**




**Natural England confirm they are satisfied with this approach in respect of any potential effects on Protected Habitats.**


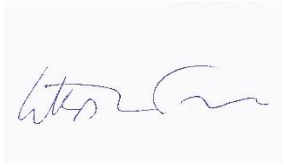
**The Environment Agency support the position set out in this Statement of Common Ground.**

## **5. Process for reviewing the Statement of Common Ground**

The Statement of Common Ground will be reviewed if matters emerge and will be updated where amendments are necessary.

## **6. Signatories**

Signed on behalf of Babergh District Council  Name: Tom Barker Position: Assistant Director	Date: 18/3/21
Signed on behalf of Mid Suffolk District Council  Name: Tom Barker Position: Assistant Director	Date: 18/3/21
Signed on behalf of Anglian Water  Name: Stewart Patience Position: Spatial Planning Manager	Date: 18/3/21

<p>Signed on behalf of Natural England</p>  <p>Name: Sam Kench Position: Lead Adviser</p>	<p>Date: 19/03/21</p>
<p>Signed on behalf of the Environment Agency</p>  <p>Name: Stephen Taylor Position: Sustainable Places Team Leader</p>	<p>Date: 22/03/21</p>