



# **Statement of Common Ground**

## **Castle Point Plan 2026 to 2043**

### **Regulation 19 Draft**

Between

Castle Point Borough Council

and

Anglian Water

November 2025

## **1. Introduction**

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and Anglian Water in relation to the Castle Point Local Plan (known as the Castle Point Plan).
- 1.2 The purpose of this SoCG is to set out the areas of agreement and any outstanding matters between the parties, in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 28) and the Planning Practice Guidance.
- 1.3 CPBC has fully engaged with Anglian Water on the development of the Castle Point Plan from the outset with regards its role as statutory consultee.
- 1.4 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, Anglian Water has been formally consulted at Regulation 18 and 19 stages of consultation.
- 1.5 This SoCG identifies the matters on which CPBC and Anglian Water are agreed, as well as any areas where differences remain.

## **2. Strategic Matters**

- 2.1 Anglian Water and CPBC agree and work collaboratively on Local Plan policies C1, C4, C6, SD1, SD2, SD3, SD6 and SD9.

## **3. Areas of Agreement (Common Ground)**

- 3.1 Anglian Water submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (1<sup>st</sup> August to 26<sup>th</sup> September 2025) on 26<sup>th</sup> September 2025. Anglian Water confirmed their position during the further consultation (October to December 2025) on 28<sup>th</sup> October 2025.
- 3.2 Anglian Water welcomes the overall content and vision of the Local Plan and commend the Council on reaching this detailed stage of development. Both authorities acknowledge the importance of water resources, supply and demand forecasting and water efficiency and look forward to future engagement as the Castle Point Plan progresses.
- 3.3 Anglian Water and CPBC have agreed support and understanding in relation to several policies and principles, as follows:

|   |  |
|---|--|
| Policy SP1 – Supporting Enhancement of the Borough’s Green Spaces | <p>Anglian Water supports the policy requirements regarding new opportunities for green and blue infrastructure (GBI) and the multi-functional benefits well designed GBI can bring to existing and new communities, particularly in terms of climate resilience and minimising the impacts of pollution - including improved water quality.</p> <p>Anglian Water have completed successful trials in partnership with Essex County Council, installing “rain gardens” SuDS help reduce the risk of flooding. In addition, Anglian Water has delivered a new mycelium wetland at Benfleet water recycling centre (WRC), in partnership with the University of Essex who will be monitoring the performance of this innovative wetland design.</p> <p>Anglian Water therefore endorse the creation of GBI either retrofitting in existing communities as part of redevelopment and urban regeneration opportunities and creating GBI in new developments.</p> |
| Policy SP4 - Development Contributions                            | <p>Anglian Water supports the policy requirement to demonstrate that there is sufficient appropriate infrastructure capacity to support development proposals, and that this capacity will be sustainable in both physical and financial terms. It is considered that this policy is consistent with Policy SD9 in terms of the need for proposals to demonstrate there is adequate foul water treatment and drainage infrastructure to serve the development.</p>   |


3.4 The entries in the table below sets out the agreed modifications to the Castle Point Plan, which resolve all Anglian Water representations. All modifications in this SoCG are also included in the Council’s Modifications Schedule.

| Rep<br>Num<br>ber | Policy/Par<br>agraph<br>Reference       | Summary of Representation/comment from Anglian Water  | Agreed response and<br>modifications   |
|-------------------|---|---|--|
| 1013              | Policy C1 -<br>Canvey<br>Town<br>Centre | <p>Anglian Water supports the policy requirements, and considers the policy sound in principle, regarding town centre greening and managing flood risk through urban greening, water capture schemes and appropriate use of materials. Anglian Water has been involved in partnership schemes to retrofit SuDS in Canvey to address surface water flood risk in the town, and therefore we consider that future growth and redevelopment of sites in the town should include appropriate SuDS through urban greening to provide overall betterment for the existing community. These types of schemes can provide additional opportunities for regeneration including enhanced public realm, positive health and wellbeing benefits, improving biodiversity and air quality.</p> <p>Anglian Water would welcome engagement in the preparation of the Canvey Town Centre Master Plan to assist with the appropriate management of surface water, following the drainage hierarchy.</p> | <p>Policy SD3 requires all new development to incorporate water management measures to reduce surface water run-off or adverse impact on water quality and ensure that it does not increase flood risk elsewhere. Policy SD3 also states that the principal method to do so should be the use of Sustainable Drainage Systems (SuDS). Supporting paragraph 21.37 states that 'Well-designed SuDS can contribute significantly towards the urban greening factor requirements set out in policy ENV3 SuDS can also contribute to climate change adaption and water efficiency, through provision of rainwater harvesting to assist in water capture to reducing risk of flooding and reduce water demand'.</p> <p>Policy C1 part 11 notes that the new Canvey Town Centre Master Plan will identify 'Opportunities for managing flood risk through greening, water capture schemes and the appropriate use of</p> |

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|            |                            |   | <p>materials.’ This could be further amended as follows:</p> <p><u>Policy C1 - Canvey Town Centre Amendment to Part 11</u></p> <p><b>The inclusion of appropriate SuDs to manage surface water flood risk in the town, to provide betterment for the community via urban Opportunities for managing flood risk through greening, water capture schemes and the appropriate use of materials to enhance the public realm, health, wellbeing, biodiversity and air quality</b></p> |
| 1013       | Policy C4 - West Canvey    | <p>The proposal to concentrate significant growth on Canvey Island is underpinned by the SFRA Level 1 and 2 and supporting technical notes. Whilst we are aware of the challenges that tidal and surface water flood risk present, we consider that the Environment Agency and Lead Local Flood Authority (LLFA) are best placed to advise on the principle of whether these risks can be managed through suitable adaptation and mitigation measures, identified in the SFRA reports, and the recommendations proposed. Anglian Water considers that proposals for the densification of West Canvey would require a surface water drainage strategy to demonstrate the effective</p> | <p><u>Policy C4 - West Canvey</u></p> <p><u>Modification to Policy: New Paragraph</u></p> <p><b>2. A surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site,</b></p>  |

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|            |                            | <p>management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3.</p> <p>Our sewerage networks can be adversely affected by surface water flooding, which can cause further impacts such as hydraulic overloading – leading to spills and pollutions. Connection to our surface water sewer network should be the final option for discharge, if all other options are demonstrated to be infeasible. Our surface water guidance sets out our approach to different development scenarios.</p> <p>Reference to urban greening and the introduction of sustainable drainage is made in paragraph 8.39 of the supporting text, and pre-application discussions with the Lead Local Flood Authority. We would therefore expect the policy to reflect this approach in more specific terms or at least refer the need for compliance with Policy SD3. Moreover, the supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed.</p> <p>Proposed Modifications:</p> <p>Policy C4 should require a surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3.</p> <p>The supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed.</p> | <p><b>with the priority for reuse and SuDS in accordance with the drainage hierarchy.</b></p> <p><u>Modifications to Supporting Text</u></p> <p>8.39 To ensure environmental quality, <b>and to reduce the risks of adverse impacts from surface water, hydraulic overloading and pollution,</b> <del>it is expected that the regeneration of west Canvey will include urban greening and the introduction of sustainable drainage.</del> <b>must be supported by a surface water drainage strategy. The Strategy will be fully informed by engagement with key partners including the Environment Agency, Water utilities companies and Essex County Council (as Lead Local Flood Authority) and will prioritise consideration of SuDS and urban greening.</b></p> <p><b>8.40</b> SuDS should be the principal but may not be the only method.</p> |

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|            |                            |  | <p>SuDs are often most viable when considered early in the design process, so developers are encouraged to engage in pre-application discussions with Essex County Council (as Lead Local Flood Authority), and refer to ECC's SuDS Design Guide, and any future updates, when preparing applications incorporating SuDS schemes. These are critical to address the impacts of climate change in an urbanised environment and especially in a low-lying area such as Canvey. Furthermore, it is expected that the development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents.</p> <p><b>Developers should engage with Anglian Water as early in the process as possible, if a connection to the public surface water sewerage system is proposed).</b></p> |

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| 1013       | Policy C6 - The South Canvey Green Lung | <p>Anglian Water supports the principle of the Green Lung designation in helping to support nature recovery on Canvey Island and consistency with the aims of the Local Nature Recovery Strategy for Essex.</p> <p>However, whilst our Canvey Island water recycling centre (WRC) is mainly excluded from the Green Lung designation on the Policies Map, it does not reflect all our operational land for this site. Our landownership for Canvey Island WRC extends further than shown on the Policies Map and includes part of the access to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.</p> <p>Anglian Water requests that the Policies Map excludes the entirety of our WRC operational land from the land indicated as 'Green Lung' (and any overlapping area identified as 'Park Homes' sites) to ensure that future operational or engineering works required in relation to maintaining or improving our essential wastewater infrastructure is not constrained by the designation. Anglian Water can provide the Council with details of our operational land/landownership for this site to assist with accuracy of the Policies Map and the attributed land designations.</p> | <p>Modification: Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated below:</p>  |
| 1013       | Chapter 9 Benfleet                      | NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites.   | NPPF paragraph 16 states that Plans should avoid unnecessary  |



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|            |  | <p>Some of the site allocation policies (Policy B3, B5, B6) includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Benfleet include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy should be specifically included? Similarly, the supporting text (paragraph 9.30) Policy B8 Manor Trading Estate references the inclusion of urban greening and introduction of sustainable drainage, but the policy includes no such requirement.</p> <p>The SFRA Level 2 recommendations stated that for all proposed development sites "peak surface water runoff rate from the development must be as close as reasonable practicable to the greenfield runoff rate...[and] Development proposals must demonstrate that the surface water will be managed and discharged from the site in accordance with the drainage hierarchy." This would suggest that either all the policies require the submission of a surface water drainage strategy that demonstrates that peak surface water runoff rates are no greater than equivalent greenfield run-off rates and the discharge of the surface water should be managed in accordance with the drainage hierarchy OR are consistent with the requirements of Policy SD3.</p> | <p>duplication of policies that apply to a particular area.</p> <p>Policies should not be read in isolation, and the Castle Point Plan is to be read as a whole.</p> <p><u>Modification to policies B5 and B6</u><br/>Remove sentence 'The proposal is compliant with all other relevant policies of this Plan'</p> <p>Note the similar sentence in Policy B3 is retained since it specifically also refers to another policy (B2).</p> |
| 1013       | Policy Had4 - Land South of Scrub Lane | <p>NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites.</p> <p>This site allocation policy includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however,</p>  | <p><u>Modification to Policy Had4</u></p> <p>Remove sentence 'The proposal is compliant with all other relevant policies of this Plan'</p>  |

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|            |  | none of the other site allocations for Hadleigh include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Whilst surface water flood risk is not identified in the supporting text the SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance with the drainage hierarchy.   | Note This is done for consistency between policies.   |
| 1013       | Policy Thun2 – Kiln Road Campus          | NOTE Consistency issue: Anglian Water recognises there are redevelopment and regeneration opportunities within the town, at various sites. This site allocation policy and Policy Thun 3 includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan". We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Similarly, surface water flood risk is identified in the supporting text (para 11.16). The SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance with the drainage hierarchy. | <u>Modification to policies Thun2 and Thun3</u><br>Remove sentence 'The proposal is compliant with all other relevant policies of this Plan'<br><br>Note This is done for consistency between policies. |
| 1013       | Policy SD1 - Tidal Flood Risk Management | NOTE: It is noted that the regeneration and redevelopment of brownfield sites on Canvey Island (Flood Zone 3a) will have to meet the Sequential Test and where appropriate the Exceptions Test. Whilst the measures in the policy are to ensure that new development is designed to be flood resistant and resilient, the supporting infrastructure, such as sewerage infrastructure, is likely to require significant investment and capital carbon in new infrastructure and ongoing maintenance, but will undoubtedly be at a much  | Noted   |

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|            |  | higher risk from the impacts of tidal flooding due to the fact our infrastructure is underground, and vulnerable to flood events  |   |
| 1013       | Policy SD2 - Non-Tidal Flood Risk Management | <p>NOTE: Whilst Anglian Water is a Risk Management Authority in terms of managing flood risks from our infrastructure, we also need to be cognisant of the impacts of new development and other forms of flood risk, such as surface water and groundwater flooding, on the resilience of our sewerage infrastructure, given our duty to ensure the area we serve is 'effectively drained'. We support the requirement for all development to integrate SuDS to contribute to the management of surface water flood risk - however this is contradicted in Policy SD3 by applying to all 'major' development (see our representation to Policy SD3).</p> <p>Supporting infrastructure for new housing and employment growth, such as our sewerage infrastructure, is likely to require significant investment and capital carbon in delivering new infrastructure and ongoing maintenance but will undoubtedly be at a much higher risk from the impacts of surface water flooding due to the fact our infrastructure is underground, and therefore vulnerable to flood events.</p> | <p>Policy SD2(9) relates to Policy SD3(1).<br/>SD3(1) states that <i>'all new development will be required to incorporate water management measures to reduce surface water run-off or adverse impact on water quality and ensure that it does not increase flood risk elsewhere'</i>.<br/>It further continues that <i>'The principal method to do so should be the use of Sustainable Drainage Systems (SuDS).'</i></p> <p>It is therefore considered implicit in both SD2 and SD3 that SuDS is required for all development.</p> <p>The reference to 'major' development in the consulted version of Policy SD3 relates to the requirement to submit a full drainage strategy, rather than SuDS.</p> |
| 1013       | Policy SD3 – Sustainable                     | Anglian Water supports the policy requirements for SuDS in principle. Whilst we recognise that the LLFA is a statutory consultee for major planning   | <u>Modification to policy SD3</u>   |

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|            | e Drainage Systems (SuDS)  | <p>applications, we would seek drainage strategies to be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network. This would be consistent with clause 9 of Policy SD2, and recommendation 5-13 in the SFRA Level 1.</p> <p>Our Surface Water Risk Management Guidance provides comprehensive approach to how we will assess different types of site in terms of surface water connections.</p> <p><a href="https://www.anglianwater.co.uk/siteassets/developers/development-services/aws-surface-water-guide-sm.pdf">https://www.anglianwater.co.uk/siteassets/developers/development-services/aws-surface-water-guide-sm.pdf</a></p> <p>For new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has been followed and require developers to liaise with the Lead Local Flood Authority (LLFA) - this is an essential pre-requisite to Anglian Water accepting a surface water drainage strategy. If LLFA are satisfied that, based upon evidence, no other option is feasible then a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow.</p> <p>The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated.</p> <p>Should network reinforcement be required because of additional surface water flow to an existing public surface water sewer, Anglian Water will request a planning condition to ensure no additional flow will be connected</p> | <p>2. All <del>major</del> <b>qualifying</b> development, will be required to submit a drainage strategy to demonstrate <b>that the surface water hierarchy has been followed</b>, how both on and off-site flood risk will be managed and <b>how</b> mitigation measures <del>should</del> <b>will</b> be satisfactorily integrated into the design and layout of the development.</p> <p><u>New paragraph 21:35</u><br/> <b>Qualifying development is major development (as defined in the GPDO) and minor development which seeks to connect to the public sewerage network.</b></p> <p><u>Consistency with SFRA recommendation 5.13</u></p> <p>Part 1 of Policy SD3 requires all development to reduce surface water run-off which is considered to reflect the SFRA recommendation.</p> |

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|            |                            | <p>until sufficient capacity in the network has been demonstrated. Reinforcement of the existing network, when required as a consequence of a new surface water connection, is not included within the Infrastructure Charge. These works may be requisitioned under Section 98 of the Water Industry Act 1991 or implemented by a self-lay provider under Section 151 of the Water Industry Act 1991, with the capital cost fully chargeable to the applicant. A cost and time-scale estimate can be provided for requisitioned network reinforcement.</p> <p>Anglian Water would seek to ensure that our surface water guidance is referenced in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new development. We agree that no developments should connect surface water discharge to the foul network. Our surface water networks are designed for the existing catchment; therefore it is assumed to have minimal residual capacity for additional flow. Once approval in principle has been reached with LLFA, detailed analysis can be undertaken to establish the receiving surface water network capacity. Detailed analysis will be required to establish whether there is existing capacity to accommodate the proposed connection and if not, to advise on the extent of network reinforcement required. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water.</p> <p>Anglian Water supports the link between SuDS and water efficiency measures through rainwater harvesting and reuse. Anglian Water works with a wide range of partners through the Ofwat Innovation Fund project - Enabling Water Smart Communities, which provides useful information on</p> |                                   |

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|            |   | opportunities for integrated water management including water reuse in new developments.   |  |
| 1013       | Policy SD6 - Pollution Control            | <p>Anglian Water supports the policy to manage and reduce pollution, particularly through water efficient design and the installation of SuDS and delivery of multi-functional green infrastructure. We welcome clause 2 which includes reference to new development being affected by an adverse effect on the environment. We deduce from this statement, that this includes introducing an 'agent of change' to an area, something which is also alluded to in clause 3 regarding impacts on existing businesses and community facilities.</p> <p>NOTE: Anglian Water would suggest the supporting text could include specific reference to wastewater infrastructure facilities such as pumping stations and our water recycling centres where we seek to recommend new development (particularly residential development) avoids encroachment on our assets due to the proximity of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of our essential infrastructure.</p> | <p><u>Modification: New paragraph</u></p> <p><b>21.56 Development proposals should be mindful of proximity to wastewater infrastructure facilities such as pumping stations and water recycling centres due to the presence of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of essential infrastructure.</b></p> |
| 1013       | Policy SD9 – Water Supply and Waste Water | <p>Anglian Water strongly supports the policy requirements. In addition to the publications referenced in the supporting text, the tighter water efficiency standard of 90 litres per person per day (l/p/d) aligns with the Shared Standards for Water Efficiency in Local Plans, which was published in June 2025.</p> <p>These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex &amp; Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan</p>   | <p>Support noted.</p> <p>Note this policy has been subject to proposed modifications and additions (Also in response to reps from Essex County Council, Natural England and Essex &amp; Suffolk Water.)</p> <p>CPBC have commissioned consultants to prepare a Water</p>   |

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|            |                            | <p>policiesto support a clean and sustainable supply of water - essential for growth and nature recovery.<br/> <a href="https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf">https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf</a></p> <p>The Shared Standards recommend that LPAs include Local Plan Policies that:</p> <ul style="list-style-type: none"> <li>• Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible (suggests a range between 85-95 l/p/d subject to viability and feasibility).</li> <li>• Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator.</li> <li>• Require new major non-domestic developments to include water saving measures and water reuse in their design.</li> </ul> <p>These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy.</p> | <p>Capacity Assessment. This work is programmed from completion in Q1 2026. CPBC will continue to keep AW informed of this additional work. This will supplement the Shared Standards for Water Efficiency in Local Plans.</p> <p>Modification to Policy SD9:</p> <ol style="list-style-type: none"> <li>1. All new residential development will be required to achieve a water efficiency standard of <b>85 90</b> litres per person per day <b>of mains supplied water/potable water</b> <del>Where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the Building Regulations will apply.</del></li> <li>2. <del>All non-residential development should achieve full credits for Wat 01 of BREEAM.</del> <b>New, extended or redeveloped non-household ('non-household' means all development except residential dwellings.) buildings aim to achieve full</b></li> </ol> |

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|            |                            | <p>Whilst Anglian Water is not the statutory water undertaker for Castle Point, tighter water efficiency standards mean lower flows of wastewater that consequently result in less operational carbon being expended in pumping flows through our networks and treatment at our WRCs. As a partner to the Shared Standards, we endorse the requirement for 90 l/p/d for new residential development and for all new non-household (commercial development) to meet the full credits in BREEAM's WAT 01 calculator. In terms of wastewater and policy clause 4 - we endorse this policy approach for wastewater infrastructure which aligns with similar policies in other Local Plans across our region. Anglian Water advises developers to seek early engagement on their proposals for wastewater connections. For example, we may require a sustainable point of connection to our network, particularly where a site may trigger a number of risks - such as pollution risks and CSO spills, surcharges of our network, existing flood potential and excess surface water flooding. We welcome the supporting text set out in paragraphs 21.72 - 21.76 which clearly define our role and investment in sewerage infrastructure.</p> | <p><b>credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.</b></p> <p>A new paragraph to be added to the reasoned justification:</p> <p><b>The <u>Shared Standards in Water Efficiency for Local Plans</u> (June 2025) are developed by Natural England, the Environment Agency, and water companies endorsed by Water Resources East to provide advice and evidence to Local Planning Authorities (LPAs) on how they can secure higher water</b></p> |



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|                   |                                   |  | efficiency standards for new<br>homes and commercial<br>developments. |

#### **4. Areas Without Agreement (Uncommon Ground)**

4.1 There are no areas without agreement.

#### **5. Ongoing Cooperation**

5.1 CPBC will continue to work cooperatively with Anglian Water throughout the examination of the Castle Point Plan and through their role as a statutory undertaker in the provision of sewerage and drainage services and as a statutory consultee for plan making and planning applications.

## Signatories

A handwritten signature in black ink, appearing to read 'A Parrott', written in a cursive style.

For and on behalf of Castle Point Borough Council:

**Name and Position:** Amanda Parrott, Assistant Director, Climate and Growth

**Date:** 2 December 2025

A handwritten signature in black ink, appearing to read 'P Jones', written in a cursive style.

For and on behalf of Anglian Water Services Ltd:

**Name and Position:** Phil Jones – Growth Strategy Manager

**Date:** 02/12/2025