Anglian Water Response to Request for Further Information

Huntingdonshire LPA Ref:	24/01965/FUL
Anglian Water Ref:	PLN-0218629
Address:	Huntingdon Fire Station Hartford Road Huntingdon PE29 3RH
Proposal:	The demolition of existing buildings on site and erection of Retirement Living apartments (Use Class C3) with associated access, car parking, landscaping, ancillary facilities, and associated works.

Details of the application of the methodology described in your consultation response:

Huntingdon (Godmanchester) Water Recycling Centre (WRC) operates under a numeric environmental permit issued by the Environment Agency.

This permit includes a defined limit on Dry Weather Flow (DWF) - the volume of treated effluent that can be discharged to the receiving watercourse.

These limits are set by the Environment Agency (EA) to ensure that the receiving water environment is not detrimentally impacted. They are based on a range of environmental factors, including the sensitivity and ecological status of the watercourse.

The limits set within our permits are designed to protect the water environment, and the EA assess the impact of these limits when granting and reviewing permits.

Therefore, any additional flow that would cause the WRC to exceed its permitted DWF is an unacceptable risk to the environment.

When assessing the receiving water recycling centre's (WRC) dry weather flow (DWF) headroom we take the latest Q90 DWF figures, as verified by the Environment Agency, and add sites with planning consent, which are yet to connect to our network, to this.

The WRC consent permit is for 10700m3 per day, however the WRC was operating at 12744m3 per day as of the 2024 Q90 data.

Please note this does not include sites which are yet to connect to our network.

Based on the above assessment, Huntingdon (Godmanchester) WRC currently lacks the capacity to accommodate the additional flows that would be generated by the proposed development.

Regarding our used water network, foul flows from the proposed development site would pass through HUNTINGDON-HARTFORD ROAD Combined Sewer Overflow (CSO).

This CSO is currently exceeding the acceptable spill count, as set by the Environment Agency.

Our spill data is available to view on our website:

https://www.anglianwater.co.uk/environment/storm-overflows

The alleged breach of the environmental legislation:

Under the Water Environment (Water Framework Directive) Regulations 2017, there is a requirement for water bodies not to deteriorate and to achieve 'good status' by 2027. Under Regulation 33, local planning authorities as 'public bodies' must have regard to these requirements as they are part of river basin management plans (RBMP). Under the National Planning Policy Framework, there is a requirement that plans and planning decisions do not result in unacceptable levels of water pollution, and development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans (para 187e).

The extent to which the development would result in a net increase in waste water flows:

We anticipate that the proposed development may result in
an additional 18.14m3 of volumetric load per day, this is directly relatable to the available capacity of the receiving Water Recycling Centre.

The discharge of foul flows from a development into the existing public foul sewerage network is not as straightforward as simply considering the net increase in waste water flows. There are several factors that must be taken into account when determining whether the existing network has sufficient capacity to accept additional foul flows from a new development. For instance, the presence of Combined Sewer Overflows (CSOs), the capacity of pumping stations, the ability of the sewer itself to cope, any existing flooding issues, and the increased risk that further flows might pose are just a few examples.

Each site is assessed on a case-by-case basis. Evaluation focuses on a local connection point to establish if it offers a Sustainable Point of Connection for the proposed development, and analysis is conducted further along the network, factoring in both the instantaneous flow rate and the daily volumetric flow rate as appropriate. This ensures a thorough and tailored approach to managing additional foul flows, safeguarding both network integrity and environmental standards.

The extent of any consequent increase in discharges through Storm Overflows:

Any additional flow poses an environmental risk due to spill increases and further WRC DWF exceedance. There are financial consequences of high spill counts when we are found to be in breach of our permit obligations by our regulators. Any dry day spills will be classed as a category 3 pollution.

It is important to note that our assessment of the foul network does not take into account flows from sites with planning consent that are yet to connect.

The sensitivity of the receiving water:

Huntingdon (Godmanchester) WRC discharges into the River Great Ouse. This waterbody was classified as having 'moderate' ecological status for both the 2019 and 2022 assessments, and 'poor' status for phosphate.

Huntingdon WRC is upstream of the Ouse Washes SSSI which has an 'unfavourable' status, linked to nutrient pollution including Phosphate as described in the Site Improvements Plans by Natural England:

https://publications.naturalengland.org.uk/publication/5354106084392960?category=4873023563759616

Phosphate nutrient loading within the river Great Ouse is linked in part to point source discharges from numerous upstream WRCs.

The additional environmental or amenity harm caused:

The limits set within our permits are designed to protect the water environment, and the EA assess the impact of these limits when granting and reviewing permits.

Therefore, any additional flow that would cause the WRC to exceed its permitted DWF is an unacceptable risk to the environment.