

Dear Rachel, Rutland planning policy team and Wing Neighbourhood plan group

Thank you consulting Anglian Water on the submission version of the Neighbourhood Plan. Anglian Water provided comments on the final draft of the Plan in February 2023 and the consultation comments below are made with reference to that submission (attached). As an update to the February response Anglian Water has now completed a £3m investment at the Wing Water Treatment Works (WTW). This is to improve the environmental performance of the site and reduce operational risks. The project involved working with the Health and Safety Executive to switch from chlorine to hypochlorite treatment. The site supply manager Sean Moyser updated the latest Wing Parish Council meeting on the investment.

I attach Anglian Waters' June 2023 Non- Domestic Demand Briefing which is based on work for the draft Water Resources Management Plan (WRMP). This is a position and policy change since Anglian Water's comments earlier this year. In summary, in meeting our regulatory commitment to ensure water supplies are available for existing homes and planned domestic growth, Anglian Water is non longer able to guarantee that water will be available to meet new non- domestic demands. The position highlights the critical nature of existing water supplies including reservoirs and the need to ensure that we mitigate climate change impacts through increasing renewable energy generation. The policy reinforces the need for the highest levels of water efficiency on employment sites and the need to go further than the 110 litres per person per day standard in current Building Regulations. We are developing a Protocol on this with the EA and Natural England.

The scarcity of water therefore places an increased importance on the weight the plan may have in Rutland's planning decisions on the operation and development of the Wing WTW and Rutland Water. Wing WTW is one of the largest water production facilities in the East of England and feeds into the Ruthamford network, supplying up to 1.2 million Anglian Water customers. We welcome the community's interest in the Wing WTW and want to ensure that the neighbourhood plan recognises the regional importance of the reservoir and the WTW. We want to ensure the Plan does not impose additional controls which could harm wider environment aims including limiting works at the WTW and so requiring solutions away from the site which have a higher carbon footprint. We have worked successfully with the local community on biodiversity management and would want to continue this collaborative approach that involves colleagues based at the Wing WTW. This emphasises that Wing WTW is an operational site which will need to be upgraded to improve its environmental performance. That may be permitted development or may require planning and other regulatory approvals.

The low levels of growth in Wing proposed by the old Rutland Local Plan and the trend for the past decade have been considered in Anglian Water's final Drainage and Wastewater Management (DWMP) published in June 2023. Therefore, no major investment is planned at the Wing Water Recycling Centre (WRC). Minor schemes such as that currently on site at the WRC and maintenance works will be undertaken as needed.

We welcome the recognition at page 54 that Anglian Water is 'the largest employer in the parish with 23 staff based at the Water Treatment Works.' With reference to our February 2023 submission, we reiterate the recognition in the Plan at page 57 that 'the existing Anglian Water site located outside of the village does provide some scope for expansion within its boundary'.

We note the Plan identifies the whole Wing WTW site including all the operational buildings as 'other sites and features of local biodiversity interest'. The Wing WTW has a designated SSSI within it designated for its geological features. We are not sighted on how the decision to identify the whole of the Wing WTW has been reached. In looking at Policy ENV3 Site and Features of Natural

Environmental Significant the requirement is to avoid impact or balancing against local benefits. This may pose a policy difficulty though, as Wing does not supply water to Rutland, and so the need to expand or update the Wing WTW may meet national environmental objectives but could fall foul of the need to show 'local benefits' in a planning application consideration balancing exercise.

Turning to Policy EN4, this requires tree surveys where trees may be impacted by development. Secondly this requires replacement planting of the same quality. EN4 does not take into account water companies permitted development rights on operational land. Parliament has provided for a limitation on permitted development through Article 4 Directions. We would welcome confirmation that this is not the intention with EN4. We would also welcome clarification that stipulation that trees should be replanted may be hampered by assets with the operational site such as pipework. Anglian Water, as all developers will be required to from November 2023, will follow the guidance on biodiversity net gain (BNG) for developments.

A similar issue arises with Policy ENV5, Biodiversity, Bat Conservation and Habitat Connectivity. This seeks to safeguard habitats and indicates that the policy would seek a refusal of planning unless there is compensation. Specifically, it goes on to say 'exterior lighting on buildings or open spaces shall not be incorporated unless demonstrably essential'. Anglian Water has permitted development rights including lighting which is installed or upgraded to comply with regulations and health and safety requirements.

Policy ENV6 Biodiversity refers to the enhancement of biodiversity which Anglian Water continues to support for example through our [Water Industry National Environment Programme](#) on projects to support the eel population in local rivers, for example. Some of the measures it lists may not be practical on an operational site such as roof and wall construction to incorporate integral bee bricks and nest boxes. Whilst we would want to support these when possible there should be recognition that operational infrastructure sites may not be able to include these measures. Again, we are committed to at least delivering the BNG requirements and our land interests at Rutland mean we are able in partnership with others to deliver landscape scale gains whilst other developments provide generic measures.

Policy ENV12 Local Landscape Areas advises that development having a harmful effect on a local landscape character will not be supported. We note that the Landscape Character Assessment comments on Wing WTW's position on top of the hill and states it 'dominates the village setting while at the same time extending the southern enclosure of the village. Careful siting and enclosure of development sites at this end of the village would seem appropriate given the existing landscape constraints'. The Wing WTW is where it is due to the need to provide water for the sub region. If it were not possible to continue to undertake essential operational works at the site, then the options would be more remote from the reservoir and so potentially be more carbon intensive (capital and operations) as well as then involving land, development, and environmental impacts in other location(s). We would also comment with reference to Policy EN13 Flooding, that the Wing WTW is located so that it is not at risk of flooding, which could jeopardise the sub regional supply of clean water. Further use and development of the WTW would continue this resilience particularly given the climate change risks from more frequent extreme weather events.

Policy ENV14 Renewable Energy Generation Infrastructure sets out that medium and large scale proposals for turbines (35m or more) or solar (5ha) will not be supported anywhere in the Plan area. Anglian Water is considering solar energy at the Wing WTW as the site uses significant amounts of energy. This would be in addition to the use of renewables as the energy source for the WTW. We are also progressing towards our net zero target by 2030 which involves generating renewable energy where natural resources make this possible. We support solar projects in principle given the

urgency of the climate crisis and also current obstacles to onshore wind electricity generation. Renewable energy generation and storage is key to energy resilience for Anglian Water to ensure that vital infrastructure and the clean water supply and water recycling they provide are always available for communities and existing businesses.

We note that a Strategic Environmental Assessment (SEA) was considered to be not required. In the absence of the SEA the draft Plan touches on operational carbon (footprint) and climate change/ carbon mitigation (sequestration) issues. The Plan does not consider the embedded (capital) carbon in existing buildings and infrastructure that if they were unable to be used effectively would be lost and potentially would have to be replaced through new development involving further capital carbon emissions. It is with this in mind that we request that the operational and critical role which the Wing WTW has and will continue to have, is recognised in the Plan's policies and supporting text.