Q2. In order to accommodate the proposed growth, improvements are required to several Wastewater Treatment Works (WwTW) to ensure that the increased waste water flow discharged does not impact on the current quality of the receiving watercourses, their associated ecological sites and also to ensure that the watercourses can still meet with legislative requirements.

The Stage 2a assessments have shown that improvements beyond conventionally applied technology are required in March WwTW (due to water quality).

What implications, if any, is this likely to have on the deliverability and phasing of planned growth in March?

We regard the Fenland Water Cycle Study (WCS) as a helpful piece of work to identify potential locations where growth may give rise to water infrastructure issues. Then in turn we can see where water infrastructure may impact on water quality with new development. This foresight also helps water companies and the Environment Agency to plan for infrastructure because land allocations count as commitments with significant weight [in Ofwat's eyes] when approving water company business plans for the local investment.

The removal of a site allocation in March may not have helped the water infrastructure planning process for any increased prospect of windfall sites, so the answer to question 2 may lie in what provision would be made for windfall sites for which Anglian Water (AW) and the Environment Agency may have less opportunity to plan for, together.

The September 2011 WCS Stage 2a represents a snapshot in time. It picks up that the Water Framework Directive 'good potential' of the watercourse [in water quality terms], cannot deteriorate to 'moderate' in relation to phosphate elements. The WCS recognises that this may not be possible with 'conventional process treatment'.

Since the WCS, Anglian Water has confirmed that the baseline flows (with which current treatment headroom can be determined) has changed following extensive flow monitoring to verify the existing consented 'dry weather flow'. This shows that there appears to be sufficient headroom within the existing consent for allocated sites in March.

On top of allocations, the cumulative effect of windfall sites may have the potential to exceed consented flows from mid to the end of the plan period if Scenario 2 levels of growth[1] are reached, with employment. Beyond this, it may be that 'conventional treatment [i.e. not carbon or mineral intensive] could be stretched. Nevertheless,

[1] See Fenland Stage 2a WCS, Page 20

treatment methods are evolving with WFD sharpening investment in phosphate treatment technology.

It would be harder to stick within volumetric flow consents if water consumption controls are not implemented in line our recommendations to Matter 14 – policy CS14. Employment development can skew capacity either way, especially if water intensive employment (e.g. food processing) grows.

Proposed Solution:

We propose that, in line with our representation to Matter 16 [CS16] on water quality, that developers of windfall sites are required by CS16 to address water quality.

Developers should demonstrate, through application submissions, that there is uncommitted capacity within waste water discharge consents. Any possible exceedance of the consented flow (as a result of proposed development) should be phased with infrastructure provision without water body deterioration or resource intensive treatment methods.

This could form part of CS16 as could be covered in Matter 16 and a joint EA, Anglian Water and Fenland DC position statement.