



**Local Plan for the Broads**  
**Statement of Common Ground**  
**Between the Broads Authority & Anglian Water Services**  
**In relation to comments made as part of the first Regulation 19**  
**consultation**  
**December 2025**

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**1. Introduction**

The first Regulation 19 consultation on the Local Plan for the Broads was held over the summer in 2025. This is one of a series of Statements of Common Ground that relate to comments made as part of that consultation. The comments are included, as well as response from the Broads Authority. If a change is proposed, that is also included.

There is a section relating to areas of agreement and areas of disagreement.

## 2. Areas of agreement

Part of Local Plan	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Proposed change to Local Plan.
PUBDM3: Pollution and Hazards in development and protecting environmental quality	Anglian Water is supportive of the policy requirements, specifically clause 3(c) which should ensure that new development is not sited close to any existing hazards or existing sensitive development. Anglian Water provides guidance on asset encroachment for our water recycling centres (WRCs) and sewage pumping stations to ensure developments provide a suitable buffer between sensitive receptors and our assets to avoid adverse impacts due to odour or noise – so the ‘agent of change’ principle is appropriately addressed. <a href="https://www.anglianwater.co.uk/developing/planning--capacity/asset-encroachment/">https://www.anglianwater.co.uk/developing/planning--capacity/asset-encroachment/</a>	N/A	Support noted and welcomed.	No change proposed.
Policy PUBDM25: Utilities infrastructure development	Whilst the reasoned justification states that the policy applies to telecommunications, electricity, gas and water infrastructure, we would suggest that the wording is more appropriately assigned to telecommunications and electricity infrastructure, which is often above ground. Anglian Water assets include underground sewers and water mains, in addition to sewage pumping stations, water recycling centres and water treatment works above ground. New infrastructure is likely to be related to new development, or provision of public sewerage networks (first time sewerage schemes) to areas currently served by septic tanks, in order to improve water quality issues. The natural beauty and biodiversity importance of The Broads is recognised, and it is considered that other policies in the Plan would be sufficient to guide new water/sewerage infrastructure, where planning permission is required. The requirement to remove any utilities equipment when it is redundant is too generic when applied to all utilities infrastructure, particularly when many of our assets are underground. However, in the context of The Broads as a designated landscape it is understandable in relation to telecommunications masts for example.	We would suggest that the purpose of the policy is either solely related to electricity and telecommunications networks or that criteria in the policy are split between those that are generic to all utility infrastructure and those specifically related to electricity and telecommunications networks.	Agree to some extent. In general, the criteria are relevant to all infrastructure types and AWS do have some infrastructure above ground.	1a) <u>The need for the infrastructure being located in the Broads is fully justified and there are no suitable alternative locations outside the Broads protected landscape; The proposal has an essential role in the provision of a regional and national network</u> 1b) <u>For electricity infrastructure, there is no opportunity for undergrounding or no suitable alternative locations outside the Broads protected landscape;</u> 2. The operator will also be required to remove any <u>above ground</u> utilities equipment when it is redundant.
Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	Anglian Water recognises the need for an appropriate policy to address nutrient neutrality requirements of the designated sensitive catchment. We welcome the reference to the appropriate section of the Levelling Up and Regeneration Act with regard to nutrient removal at nutrient significant plants (our WRCs serving a population equivalent of 2,000 or more) within the catchment areas, which will be progressed during AMP8 (2025-2030).	N/A	Support noted and welcomed.	No change proposed.
Policy PUBDM11: Green and blue infrastructure and Public Rights of Way	Anglian Water welcome the policy aims to support the delivery of green and blue infrastructure and alignment with the emerging Local Nature Recovery Strategies for Norfolk and Suffolk. We also support the reference to new green and blue infrastructure incorporating SuDS as part of the multi-functional benefits that can be provided.	N/A	Support noted and welcomed.	No change proposed.
Policy PUBDM9: Surface water run-off	Anglian Water supports policy to ensure all development proposals follow the drainage hierarchy for surface water. Discharge to a combined sewer will only be agreed in very exceptional circumstances, which are set out in our surface water risk management guidance which can be found here. We recommend that it might be helpful to reference our new guidance with additional sources of information in the supporting text. Anglian Water will seek to separate any surface water from any new developments to relieve the existing pressures and treatment requirements. It should be made clear in the policy or supporting text that no surface water flows will be accepted into the foul drainage network. The misconnection of surface water sources into our foul drainage network is the main contributor to hydraulic overloading, leading to spills and pollution events. See our Pollution Incident Reduction Plan 2025 for further information. Clause 2: Anglian Water agrees that betterment should be sought and encouraged particularly on brownfield sites, or on any site which could provide betterment for surface water flooding issues experienced more locally. Furthermore, we agree that run-off rates need to be agreed with Anglian Water, as the sewerage undertaker, where connections to our network are required. <a href="https://www.anglianwater.co.uk/corporate/strategies-and-plans/pollution-incident-reduction-plan/">https://www.anglianwater.co.uk/corporate/strategies-and-plans/pollution-incident-reduction-plan/</a>	It should be made clear in the policy or supporting text that no surface water flows will be accepted into the foul drainage network.	Agree.	Add suggested text to supporting text.
Policy PUBDM8: Development and flood risk	Anglian Water supports the policy approach to ensure that new development follows national policy and guidance. The Environment Agency’s release of NaFRA2 provides the most up to date information to inform sustainable and resilient growth in The Broads Executive Area.	N/A	Support noted and welcomed.	No change proposed.

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Policy PUBSP2: Strategic flood risk policy	<p>Anglian Water supports the approach of this strategic policy and welcome in the inclusion of climate change allowances, when taking account of flood risk in new development proposals. We agree that SuDS should be the principal method of mitigating surface run-off in accordance with the drainage hierarchy. NOTE: Clause 4 lists the risk management authorities that would be consulted in relation to managing flooding risks. Anglian Water is also a Risk Management Authority, as identified in the Flood and Water Management Act 2010, in respect of managing the risk of flooding to water supply and sewerage facilities, and flood risks from the failure of infrastructure. We work with developers to assess the risk of new development connecting to our networks and provide guidance to assist with managing surface water flood risk. <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>	N/A	Support noted and welcomed.	No change proposed.
Policy PUBDM7: Water efficiency and re-use	<p>Anglian Water considers the policy is SOUND in principle, however, with the publication of the Shared Standards for Water Efficiency in Local Plans, we are now advising local planning authorities to introduce tighter water efficiency standards using the evidenced approach. Given The Broads Local Plan is at an advanced stage, we are mindful that the Shared Standards represents a step change, but the Shared Standards would provide the evidence required to support the policy specification "any higher standards established ... locally". The Shared Standards for Water Efficiency in Local Plans was published in June 2025. 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 policies to support a clean and sustainable supply of water - essential for growth and nature recovery. We 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.</li> <li>•Require new, extended or redeveloped non-domestic1 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. It is considered that a modification to Policy PUBDM7 can help make development in The Broads more water efficient and allow sustainable growth, whilst longer term water supply solutions are being developed/implemented. As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives.</p>	<p>All new/replacement/converted dwellings (including holiday/visitor accommodation and residential ancillary accommodation) will be designed to have a water demand equivalent to <del>110</del> 90 litres per head per day of mains supplied potable water or any tighter water efficiency higher standard subsequently established nationally through Building Regulations Part G or locally. Measures to reduce water demand further will be encouraged and supported.</p> <p><u>A Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following:</u></p> <ul style="list-style-type: none"> <li>• <u>Baseline information relating to existing water use within a development site; and</u></li> <li>• <u>Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling).</u></li> <li>• <u>Prior to the first occupation of development a completion certificate shall be submitted to the Local Planning Authority confirming the design standard for water efficiency has been verified and fully implemented.</u></li> </ul>	<p>Comment noted. Prior to the publication of the REG19 version of the Local Plan, working with Anglian Water, Environment Agency and Essex &amp; Suffolk Water, on receiving the 'Shared Standards', the Authority tried to amend the draft policy to 90l/h/d. Following research, it was found that there was no guaranteed way of checking the delivery of this policy. This is beyond the optional building regulations and so it would not be checked by building regulations. As such, it was agreed to not include the standard but if the organisations above wished to raise it as part of their response to the Local Plan, it could be considered through the Examination. We also note that there is a consultation out relating to the building regulations: <a href="https://consult.defra.gov.uk/water-efficiency-demand/review-of-water-efficiency-standards/">https://consult.defra.gov.uk/water-efficiency-demand/review-of-water-efficiency-standards/</a>. This public consultation includes an option to revise the minimum Water Efficiency Standard in new houses through fittings from 125 l/p/d to 105 l/p/d, and the optional technical standard from 110 l/p/d to 100 l/p/d. Does the organisation still want to pursue 90l/h/d?</p>	<p>The Authority would be content in amending the use to 90l/h/d.</p> <p>Accept the other proposed changes or similar as proposed by other organisations.</p>

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Policy PUBDM7: Water efficiency and re-use	<p>It is recognised that the Broads Local Plan is at an advanced stage in its preparation, but this consultation provides an opportunity to include a tighter water efficiency standard that can be justified by evidence set out in the annexes supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that:</p> <ul style="list-style-type: none"> <li>•The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations. There are non-domestic water restrictions in both Anglian Water and Essex &amp; Suffolk Water areas which are referenced in the supporting text to Policy PUBDM7.</li> <li>•Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SSSIs in the Shared Standards area, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures. The Norwich and the Broads water resource zone (WRZ) is identified as one of the WRZs with deterioration risk as a result of abstraction pressures.</li> <li>•At present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. In addition, water companies offer incentives to developers to build water efficient homes. These are tied into water company Business Plans that are published every five years, with the latest being published in 2025 alongside WRMPs. For example, Anglian Water offer a £500 incentive for residential properties that achieve a water efficiency standard of 90 l/p/d which would be within the shared standards water efficiency parameters of 85-95 l/p/d suggested for Local Plan policies. These incentives can support the viability of delivering water efficiency measures. Based on the Shared Standards introducing a 'locally established water efficiency standard', Policy PUBDM7 could be modified to reflect the recommendations in the Shared Standards. Whilst the overall level of development in The Broads is low, it is considered the evidence set out in the Shared Standards is clear that tighter water efficiency standards are necessary for sustainable growth and nature recovery, which supports the National Park purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Parks, and the long term vision and fundamental principles for the Broads National Park in the Broads Plan 2022-2027.</li> </ul>	<p>Washing up provision and toilets and showers associated with camping, caravanning and glamping sites are required to be designed to be water efficient <u>and should aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) under the BREAAM standard, with a minimum score of 3 credits within WAT01 Water Consumption.</u></p>	<p>Agree to some extent. Water standard of BREEAM cannot be used in isolation. As such, we have introduced a BREEAM standard (see policy PUBDM55: Non-residential development and BREEAM) which refers to a requirement to meet credits in WAT01 and other WAT calculators. So to include reference to that would be repeating another policy. The wording as included is aimed at all non-domestic buildings, including those that are below the 250sqm threshold.</p>	<p>No change proposed.</p>
Policy PUBDM5: Water quality and foul drainage	<p>Anglian Water supports the policy approach in terms of the need to demonstrate adequate foul drainage and adequate sewage provision is available to accommodate wastewater flows from new development, including residential moorings with associated pump-out facilities. This approach 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 which encourages developers to undertake pre-planning engagement. We endorse the policy requirement regarding Horning Knackers Wood water recycling centre (WRC) and the explanation in the supporting text. Work has been completed to bring the WRC into permit compliance for dry weather flow. However, this will require monitoring to assess whether the specific constraints and challenges in the WRC catchment have been successfully mitigated by this investment. Anglian Water has provided The Broads Authority with details of capacity at our WRCs for the residential allocations within the Local Plan. Our investment during successive 5-year asset management periods (AMPs) must remain within the limits as approved in our final determination from Ofwat. We are currently in the process of preparing our next Drainage and Wastewater Management Plan (DWMP) which will assess numerous factors, including forecasted growth in all 1,100 of our WRC catchments and review our risk of compliance performance against the discharge permit (as issued by the Environment Agency). We work with the Environment Agency to prioritise those catchments where investment in additional treatment capacity is required and to secure funding for this from Ofwat via the Price Review process.</p>	<p>N/A</p>	<p>Support noted and welcomed.</p>	<p>No change proposed.</p>
Policy PUBWH11:	<p>Anglian Water supports the policy approach – particularly the reference to safeguarding our existing assets within the country park.</p>	<p>Not seeking changes</p>	<p>Support noted and welcomed.</p>	<p>No change proposed.</p>

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Whitlingham Country Park plus adjacent land				
Policy PUBTHU1: Tourism development at Hedera House, Thurne	Anglian Water does not have a sewerage network in Thurne, and therefore existing properties will be served by private wastewater treatment systems such as septic tanks or package treatment plants. Clause 1.iv) would require modification to be consistent with Policy PUBDM5 with regard to wastewater disposal, where it is not feasible to connect to the mains sewer. Similarly, the constraint listed in the supporting text regarding capacity issues at Ludham-Walton Hall WRC is not relevant.	Clause 1.iv) would require modification to be consistent with Policy PUBDM5 with regard to wastewater disposal, where it is not feasible to connect to the mains sewer. Similarly, the constraint listed in the supporting text regarding capacity issues at Ludham-Walton Hall WRC is not relevant.	Agree.	Delete reference to Ludham-Walton Hall Water Recycling Centre capacity issues.  Amend part 1 iv) <u>Demonstration of a suitable and appropriate foul water disposal method that is in conformity with Policy PUBDM5 that there is adequate capacity in the water recycling centre (sewage treatment works) and the foul sewerage network to serve the proposed development</u> , and that proposals demonstrate they will not have an adverse impact on surface or ground water in terms of quality and quantity;
Policy PUBCAN1: Cantley Sugar Factory	Anglian Water supports criterion 2(n) regarding water efficiency and re-use. We would recommend that this is cross referenced to Policy PUBDM31 for consistency. We also welcome reference to our existing water main within the site in criterion 2(o).	We would recommend that this is cross referenced to Policy PUBDM31 for consistency.	Agree.	Cross refer to Policy PUBDM31 and PUBDM55 for consistency.
Policy PUBDM55: Non-residential development and BREEAM	Anglian Water supports this policy regarding the "Water efficiency" requirements of the BREEAM water calculators which align with our recommended approach in the Shared Standards for Water Efficiency in Local Plans (see our commentary under Policy PUBDM7).	However, it might be more relevant to include these requirements in PUBDM7 or PUBDM31 for consistency. <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>	Agree to some extent. Water standard of BREEAM cannot be used in isolation. As such, we have introduced a BREEAM standard (see policy PUBDM55: Non-residential development and BREEAM) which refers to a requirement to meet credits in WAT01 and other WAT calculators. So to include reference to that would be repeating another policy. The wording as included is aimed at all non-domestic buildings, including those that are below the 250sqm threshold.	Clarify part 4 of PUBDM7 and cross refer to DM55. Then in supporting text, explain the criterion better and cross refer to DM55.
Policy PUBDM52: Design	Anglian Water supports the policy aims for design particularly those that relate to safeguarding on site utilities infrastructure, sustainable design including water efficiency measures, and flood risk and resilience. This reflects our comments on similar policy themes.	Not seeking changes	Support noted and welcomed.	No change proposed.
Policy PUBDM46: New residential moorings	Anglian Water agrees that proposals for residential moorings should have adequate access to pump out facilities that connect to the main sewer (and available headroom at the receiving WRC) consistent with the requirements in Policy PUBDM5 – unless there are alternative private treatment facilities in locations that are not within a reasonable distance to connect to the mains sewer.	Not seeking changes	Support noted and welcomed.	No change proposed.
Policy PUBSP15: Residential development	Anglian Water agrees with the aims of the policy and the need to be consistent with other policies in the plan. We acknowledge that the statement in the supporting text that "Development within settlements will be permitted only where it meets criteria covering issues such as flood risk, satisfactory provision of infrastructure, and design", would address our key concerns around flood risk, infrastructure capacity, and resilience over the longer term.	Not seeking changes	Support noted and welcomed.	No change proposed.
Policy PUBDM40: Moorings, mooring basins and marinas	Anglian Water agrees that proposals for moorings, particularly permanent moorings, should have adequate access to pump out facilities that connect to the main sewer (and available headroom at the receiving WRC) consistent with the requirements in Policy PUBDM5 – unless there are alternative private treatment facilities in locations that are not within a reasonable distance to connect to the mains sewer.	Not seeking changes	Support noted and welcomed.	No change proposed.

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Policy PUBDM31: New employment development	Anglian Water considers the policy sound in principle, and supports the policy requirement 1(j) in relation to non-household developments and non-domestic water requirements, which reflects our submission to the Preferred Options Local Plan consultation in 2024. However, our Non-Domestic Water Requests Position Statement has subsequently been updated (December 2024) such that any requests for non-domestic water that exceed 20m3/day will be declined, in order to protect existing supplies and the environment. Consequently, we will no longer require a Water Resources Assessment to be submitted for non-domestic water requests, as it is now a binary decision on whether the request is equal to or less than 20m3/day, or greater. Furthermore, the non-domestic water requirement may not only apply to major development, as it is rather the type of business, not necessarily the scale.	We recommend the policy is amended to state: j) non-household developments that require significant non-domestic water use need to undertake early discussions with the relevant water company (Anglian Water or Essex & Suffolk Water) to ascertain water availability and feasibility of their scheme, and also demonstrate how they will reduce water demand;	Agree.	Amend j) to say: <u>non-household developments that require significant non-domestic water use need to undertake early discussions with the relevant water company (Anglian Water or Essex &amp; Suffolk Water) to ascertain water availability and feasibility of their scheme, and also demonstrate how they will reduce water demand</u>

### 3. Areas of disagreement

None.

### 4. Signed

For the Broads Authority: Natalie Beal, Planning Policy Officer, 1 December 2025

For Anglian Water Services: Phil Jones, Growth Strategy Manager, 19/12/2025