

Our Drainage and Wastewater Management Plan

Statement of Response May 2023



Statement of Response

We provided two opportunities to respond to our draft DWMP, through an eleven week consultation period in summer 2022, and a three week consultation period in February 2023. This statement of response is a collation of all comments received, and outlines our actions and/or responses to the feedback received.

Comments are listed in alphabetical order of the consultee organisation.

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
1	Water company	Affinity Water	We recognise the importance of effective drainage systems and the importance of removing surface water from your foul sewerage systems which is one of stated aims in the main long-term strategies discussed in the draft DWMP. This is expected to reduce flood events and storm overflows, minimising the potential risk of pollution to groundwater and surface water bodies.	Support on approach is noted.	-
2	Water company	Affinity Water	We welcome the acknowledgement and support the use of green solutions such as sustainable drainage systems (SuDS) when removing surface water. Surface water removal is a complex issue as it is often location and problem specific. Water that is captured using SuDS should ideally utilise natural processes to ensure that sufficient treatment capability is in place to capture potentially harmful contaminants, before it is allowed to percolate through to the aquifers where it may affect groundwater quality.	Noted. We will work alongside our water resources team when designing solutions.	-
3	Water company	Affinity Water	During storm events there is potential for drainage and sewer systems to be overwhelmed, particularly where surface water removal may not be in place. The excess water is likely to be discharged into rivers and it is important to consider the potential impact that changes in baseflow can have on geomorphology. We would welcome future engagement on the locations of any discharge	We will continue to engage with you as we move into a wider catchment approach during our design stages. We are also happy to have discussions at any point.	-

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			points along rivers within our supply area to maximise the opportunities to support river flows and identify opportunities to collaborate on river restoration or habitat enhancement works. This would be particularly significant in rivers that experience low flows in their upper reaches.		
4	Water company	Affinity Water	We welcome the approach of using ‘escape from sewers’ as one of the three themes comprising the 10 objectives within the draft DWMP. We agree that protecting groundwater sources from sewerage collapse/flooding is essential to protecting our customers.	Support on approach is noted.	-
5	Water company	Affinity Water	In addition to sewer leakage, we are also aware of the issue of groundwater infiltrating into the sewers. It is important to understand the benefits of minimising the amount of groundwater draining into the sewer network, especially in the context of planned groundwater abstraction reductions.	We consider infiltration removal as part of our optioneering assessment to prevent the infiltration of groundwater into our system. Thank you for highlighting the additional benefit this could bring to abstraction.	-
6	Water company	Affinity Water	We are supportive of a collaborative, holistic, water cycle-based approach to the management of our catchments, to ensure risks and opportunities are identified and addressed appropriately. As a water supply only company operating in your wastewater catchments, we would welcome further engagement with Anglian Water regarding finalisation of your DWMP and any future works that may arise as a result of synergies with other plans and programmes.	We look forward to continue to work with you.	-
7	Water company	Affinity Water	The Water Resources East (WRE) forum may also provide us with opportunities to develop plan solutions to meet multiple needs collaboratively with neighbouring companies and our up- coming draft WRMP24 submission	We welcome your support.	-

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			will include reference to our continued commitment to working with Anglian Water across both sets of plans.		
8	Council - Planning	Basildon Council	The figures detailed do not align with ONS population projections (2018) or the Basildon Borough Revised Publication Local Plan 2014-2034 (now withdrawn) which predict an ongoing annual increase in population growth in the Borough. It is requested that this data be reviewed in case of an input error.	As outlined in the text we collect our numbers through using a consultancy using local plan information. We're happy to review these figures and discuss locally.	Technical Report - section 5.6
9	Council - Planning	Basildon Council	Anglian Water may find it useful to consider if there is a role in seeking to work closely with other water companies, and Government agencies such as Natural England and the Department for Levelling Up, Housing and Communities to achieve these aims.	Noted. We are actively involved in these discussions.	-
10	Council - Planning	Basildon Council	Anglian Water is preparing to mitigate against negative impacts from a 2 degree temperature rise and this seems a sensible approach to take for the dDWMP.	Agreement in approach is noted.	-
11	Council - Planning	Basildon Council	It is not clear of the criteria used to identify opportunities for partnership working.	Partnership opportunities were identified with stakeholders during the DWMP workshops, of which Basildon Council were invited to. We acknowledge there are likely to be multiple opportunities available in areas that due to attendees remit were not discussed during these meetings. We're keen to ensure we identify as many partnership opportunities as possible and welcome ongoing engagement in this area.	-
12	Council - Planning	Basildon Council	Basildon Borough has been split across two catchment areas; most of the borough falls within the Essex Rivers Hub CaBA, yet Pitsea falls in the South Essex CABA. It is unclear how or why this is the case.	We have presented the DWMP in CaBA boundaries which are pre-defined areas. We have also presented information geospatially in a range of formats online.	Link to maps

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13	District / Borough council	Braintree District Council	The plan should definitely plan for climate change of at least 2 degrees with a 5 year review considering if planning for 4 degrees has become advisable. There should be capacity built in to cope with an increase in temperature and sudden rainfall events.	Noted. The plan will be re-produced in five years time and we will re-assess the climate change requirement during that process.	-
14	District / Borough council	Braintree District Council	I would recommend that the Local Plan figure is the figure to use. The Braintree Local Plan has just been adopted and will be reviewed as a matter of course in 5 years.	Your concerns are noted. Following all stakeholder feedback we have continued with focussing on a mid point growth scenario for the final DWMP. Whilst planning entirely for a Local Plan scenario would be ideal, the impact on customer bills in the current financial climate, may risk wasted investment and unnecessarily higher customer bills. As part of our LTDS we will explore the impact of a higher demand scenario. This has been reviewed as part of our alternative scenarios.	Technical Report - Section 12.8
15	District / Borough council	Braintree District Council	Plan policy supports provision of SUDs and this has become current practice for major applications. Appropriate dual use of SUDs is supported where appropriate but where it can happen without compromising either use. This is a landlocked district under water stress so opportunities for wetlands may be limited but supported by policy where appropriate.	Noted.	-
16	District / Borough council	Braintree District Council	The strategy needs to cover situations where removal of surface water does not result in improvement. The long-term strategy should give consideration to maintenance arrangements.	Ongoing and increased maintenance are considered alongside all enhancement options. This is outlined within our Generic Options.	Technical Report - section 5.8
17	District / Borough council	Braintree District Council	Planning for the long term, to direct investment where it will help reduce or eliminate flooding and ensure necessary infrastructure for future growth and existing development is to be welcomed.	Noted.	-

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18	District / Borough council	Braintree District Council	The Council welcomes a strategy and measures to improve the water infrastructure and reduce pollution. Adherence to the targets and advice set by DEFRA and the Environment Agency, as a minimum are supported. It is for the statutory Authorities to assess the more technical details on how far the plan meets statutory guidance.	Noted.	-
19	District / Borough council	Braintree District Council	High priority should be given to rivers and bathing waters. Rivers should be a priority as they are also used for wild swimming and other recreational activities and can feed lakes which are or can be used for such activities. Higher water quality standards are likely to improve public health for those using rivers for recreation across wide area as benefiting biodiversity. abstracted downstream.	Noted.	-
20	District / Borough council	Braintree District Council	It is preferable that more serious problems are resolved first and nature based solutions are developed in tandem where less acute.	Noted.	-
21	District / Borough council	Braintree District Council	The organisation can support through participating in consultation and workshops particularly on developing future local plan strategy. There may be scope for supporting a collaborative approach on nature based solutions where opportunities arise.	Noted. We look forward to working with you.	-
22	CaBA	Broadland Catchment Partnership	Specifically called out Pollution, Storm overflows, WRC compliance as priorities for the medium and long term due to their big impact on the environment and that they are likely the best way of improving environmental outcomes into the future.	Noted.	-
23	CaBA	Broadland Catchment Partnership	The BCP suggest that the DWMP in addition to considering growth should also consider investing in solutions to reduce water wastage and remove surface water from the sewers	Removing surface water is a key element of the DWMP strategy. It should be noted that we have been actively campaigning for the removal of the "right to connect" and have been supporting	-

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			within existing building stock. They also state that in principle they support the campaign to stop the right to connect.	Defra in their review of the Flood and Water Management Act Schedule 3 which includes the removal of the "right to connect".	
24	CaBA	Broadland Catchment Partnership	The BCP have indicated their clear support of a green solutions based approach to managing surface water. They have suggested that a large part of promoting green solutions is ensuring that customers are aware of the incentives that already exist and have pointed in particular to promoting incentives for homes which do not have their surface water connected to the sewerage system through a campaign and providing clear advice on the basis that this could make a big difference.	Noted. This can be incorporated as part of a customer education programme.	Technical Report - section 5.8
25	CaBA	Broadland Catchment Partnership	BCP strongly support working in partnership and taking a catchment based approach.	Noted.	-
26	CaBA	Broadland Catchment Partnership	BCP stress the importance of water quality within water bodies with high usage even when not designated as an inland bathing water.	Noted. We appreciate that non bathing waters can be just as important both environmentally and recreationally. Our storm overflow plan focusses on addressing the High Priority waterbodies first. Along with the EA and Defra definitions of high priority overflows, we included discharges into non-bathing waters but the waters are known recreational sites e.g. wild swimming, rowing clubs. Knowledge of this was reliant on stakeholders getting back to us via the Rivers Trust. We will look at opportunities of improving this data set ahead of PR29 for next round of improvements. More detail is outlined within the text.	Technical Report - section 5.9
27	CaBA	Broadland Catchment Partnership	BCP expressed the need for the DWMP to have appropriate levels of investment and to be linked into other plans such as WRMP,	The DWMP and WRMP teams have worked closely together in creating these two key strategic documents and we have identified	Technical Report - section 10.1

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			specifically calling out the need to consider the role wastewater can play with regards to water reuse opportunities	areas where water re-use is possible. This additional information has been added in the document.	
28	Environment Group	Broads Angling Services Group	Neither the local authority planning system or the water industry has processes that encourage investment beyond its current 5 year planning cycle. This place's a significant challenge on how long term 25 year planning can be achieved.	Agree however we believe that the DWMP is a step towards the right direction. Ofwat have also asked water companies to produce a Long Term Delivery Strategy to enable long term planning. More information on this is included in the document.	Technical Report - section 10.1
29	Environment Group	Broads Angling Services Group	Current predictions indicate a 2 degree increase by 2050 so this seems an appropriate figure to use for the next 35 years.	Support on process is noted.	-
30	Environment Group	Broads Angling Services Group	as the local plans operate on a five year cycle and so although the data gives the local picture it does not give a long-term forecast. The ONS data on its own does not give an accurate picture of local population growth.	Support on process is noted.	-
31	Environment Group	Broads Angling Services Group	promoting incentives for homes which do not have their surface water connected to the sewerage system through a campaign and providing clear advice could make a big difference.	This can be incorporated as part of a customer education programme. Have included within the text.	Technical Report - section 5.8
32	Environment Group	Broads Angling Services Group	Working at the catchment level helps to provide joined up thinking and ensures that we can have the biggest impact.	Support on process is noted.	-
33	Environment Group	Broads Angling Services Group	We think that it is important to note that plenty of people use the rivers and other water bodies for activities where they come into contact with the water, including sports such as paddle boarding, kayaking and of course Angling. Although these are not designated bathing waters they are heavily used and Anglian Water should be aware of this.	Noted. We appreciate that non bathing waters can be just as important both environmentally and recreationally. Our storm overflow plan focusses on addressing the High Priority waterbodies first. Along with the EA and Defra definitions of high priority overflows, we included discharges into non-bathing waters but the waters are known recreational sites e.g. wild swimming, rowing clubs. Knowledge of this was reliant on stakeholders getting back to us	Technical Report - section 5.9

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				via the Rivers Trust. We will look at opportunities of improving this data set ahead of PR29 for next round of improvements. More detail is outlined within the text.	
34	Environment Group	Broads Authority	We are concerned about internal and external flooding and storm overflows which are an existing problem in many areas, such as the Bure. We are concerned about the expected increase and the impact on the environment, residents and water users.	We have since released our consultation on our Storm Overflow plan and outlined the details within the text.	Technical Report - section 5.9
35	Environment Group	Broads Authority	A 2 degree increase seems sensible, although this should be reviewed as new evidence comes forward.	Support on process is noted.	-
36	Environment Group	Broads Authority	Local Plan 5 yr cycle is an issue. We believe that the Local Plan is not the right place to get these figures alone. ONS population forecast needs to be considered, so on balance we think this is the right approach.	Support on process is noted.	-
37	Environment Group	Broads Authority	We believe that more could be done with partners and communities to bring forward priority first time rural sewage schemes. We are seeking a greater degree of engagement with Anglian Water about this topic, and we would welcome the opportunity to discuss further.	Since 1998 we have continued to have the largest programme of S101a schemes in the UK. We are aware that the provision of new public sewerage, needs to be balanced with all the other environmental needs. In collaboration with the Environment Agency we encourage more connections to the schemes that are being implemented.	-
38	Environment Group	Broads Authority	Rivers are also bathing waters. The Broads attracts more than 7 million visitors a year. We have seen significant increase in 'high water contact' or 'splash-sport' recreation, including canoes, paddle boards and swimming in the Broads and Broadland waterways in recent years. We believe that to bring inland waterways up to similar standards to recognised coastal bathing waters requires considerable investment. Our work with the	Noted. We appreciate that non bathing waters can be just as important both environmentally and recreationally. Our storm overflow plan focusses on addressing the High Priority waterbodies first. More detail is outlined within the text.	Technical Report - section 5.9

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			Broads Local Access Forum shows support for both designating inland bathing waters and protecting river habitats from storm overflows.		
39	Environment Group	Broads Authority	We agree that green solutions deliver multiple, sustainable and low carbon benefits.	Noted.	-
40	Environment Group	Broads Authority	We are keen to work with Anglian Water and would like someone to connect with us to discuss the opportunities we are setting up.	Noted. Please do get in touch at DWMP@anglianwater.co.uk where we can pass you to the most relevant person.	-
41	Environment Group	Broads Authority	We believe that more could be done to promotions of existing incentives. Where feasible and cost beneficial novel water capture and reuse in existing streets should be implemented.	Noted. This can be incorporated as part of a customer education programme.	Technical Report - section 5.8
42	Environment Group	Broads Authority	Broads Authority have shared brief information regarding the work they are currently undertaking in partnership with others and have expressed a desire to work with AW on some of these moving forward.	Thank you for this information.	-
43	Council - LLFA	Buckinghamshire Council	The plan at present should follow Central Govt guidance, but should be flexible to adapt to any changes that are made to the guidance during the lifecycle of the plan.	Agree. Whilst the DWMP is a static document the plan is to be adaptive, being continually reviewed with the most up to date information. This has been included in the text.	Technical Report - section 12.6
44	Council - LLFA	Buckinghamshire Council	The way in which the plan is going to be flexible and adaptable could be clearer and more transparent.	We have included further explanation within the text.	Technical Report - section 12.6
45	Council - LLFA	Buckinghamshire Council	In your strategic context document you say that your “climate-related goals are ... to adapt, so that we are fit for 4 degrees - that is so that our services are resilient if global temperatures rise by 4deg” However in this question you say that you have prioritised planning for a 2 degree increase in temperature. Can you make clear which of these scenarios your DWMP is based upon.	The DWMP is based on a 2 degree scenario in the majority of cases. However we have identified where it would be cost beneficial to prepare for a 4 degree change in some catchments. This is expanded on in the text.	Technical Report - section 6.4

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46	Council - LLFA	Buckinghamshire Council	Although the growth forecast has been based on local authority data, this does not set out the exact housing figures this has been based on and the time period. For the purposes of transparency, this information must be included.	For sewerage planning we tend to work on increase in population rather than property. Working on an average occupancy rate of 2.35 per property. This has been included in the text.	Technical Report - section 5.6
47	Council - LLFA	Buckinghamshire Council	It is not clear if Anglian Water have aligned its capital forward planning for investment in the network with respect to the phased accommodation of housing growth set out existing and emerging development plans including allowances for cross boundary and windfall and background growth.	Our approach to understanding future growth is outlined in the text. We have updated with reference to cross boundary assessments.	Technical Report - section 5.6
48	Council - LLFA	Buckinghamshire Council	How do you propose to encourage and facilitate the partnership working? How do you future proof the plan to be less dependent on the existing key personnel? It is important to partners to keep that momentum in the years ahead. As this is a focus of the plan would it be useful to have an objectives/and or a measurable target within the plan to ensure that the good work done is carried forward into the next phase?	We will continue with stakeholder engagement following publication of the DWMP, as we move this plan into business as usual and start the second iteration.	-
49	Council - LLFA	Buckinghamshire Council	The risk in deliverability needs to be highlighted. The ambitions are good but there must be some aspects of the plan which you are less confident about delivering and it would be good to be transparent about this.	We are aware that the future may not pan out as we have currently proposed, we have therefore identified alternative pathways as a consideration. We will review our trajectory when creating the next DWMP and amend pathways where required. We have outlined this more in the text.	Technical Report - section 12.8

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50	Environment Group	Cam Valley Forum	Nowhere in your procedures of consultation is there any consideration or evaluation of your own past performance or, indeed, a call for us to evaluate that past performance! This element must detract from our trust for the future as the position is presently not great. Much of Dr Alan Woods work for us, and sent on to you received too little recognition.	The DWMP is a forward facing review of 2025-2050. We have considered our baseline performance during the process and shared this at the BRAVA stage. We acknowledge the useful information provided and take on board all comments. We appreciate the concerns raised, particularly around the effects of climate change, the health and quality of our rivers and chalk streams (including bacteria, phosphate and nitrate levels, and eutrophication).	-
51	Environment Group	Cam Valley Forum	Do you routinely examine ‘the failures’ of operations in the past? Surely, yes, but you need to acknowledge it. Were you more attuned to that then the nine listed DWMP steps (from strategic context to final plan) would be trusted better.	We put in place lessons learnt from previous experiences. The DWMP is being developed because we recognise that pro-active strategic planning is a better approach than being reactive.	-
52	Environment Group	Cam Valley Forum	Given that warming has been well over 1° Celsius, and is rising like a rocket, 2° Celsius is at least very probable and the only sensible target to have in mind.	Noted.	-
53	Environment Group	Cam Valley Forum	The Cam Valley Forum sees the DWMP process as a means of alerting Anglian Water to the poor water quality that we, as stake-holders, are aware of. CVF’s two main concerns are the health risk from bacteria and viruses from human and animal faecal sources, and secondly the detrimental effects of eutrophication. The first is presently a threat to water recreations such as swimming, and rowing. The second, eutrophication, is if anything more serious.	The DWMP is not being developed for this purpose, but rather to ensure that we can identify concerns against the 10 planning objectives and collaboratively identify strategies to address. For this first DWMP, river water quality was not a planning objective in it’s own right, however it may be in future iterations of the DWMP.	-
54	Environment Group	Cam Valley Forum	We have heritage Chalk streams to defend. We want the Cam to become cleaner and less eutrophic. This needs both less pollution, and more abundant flows to dilute and wash away contamination. However, in summer the flow	Noted.	-

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			is often so low that it reduces significantly the rivers capacity to cope with Sewage Treatment Works effluent		
55	Environment Group	Cam Valley Forum	With respect to Storm Overflows we expect of course Anglian Water to become fully compliant with DEFRA legislation on CSO reductions. We support the Storm Overflow Action consultation. Cam Valley Forum considers CSOs presently to be less of a threat to our rivers than the overload of smaller STW (Water Recycling Centres) that presently seems to have been allowed to reach unacceptable levels by the Environment Agency as the regulator.	The plan for storm overflows have been included in the final DWMP. Following stakeholder consultation in February 2023.	Technical Report - section 5.9
56	District / Borough council	Cambridge City and South Cambridge District Councils	Existing levels of water pollution pose a threat to public health, wildlife and the amenity of the valuable rivers and streams in Greater Cambridge and erodes public confidence in all of the agencies associated with managing future growth of this important area into the future. A focus by Anglian Water on ensuring water is treated to a high standard before it is returned to the rivers in terms of both pollutants and level of nutrients is therefore required.	Our discharges are permitted by the Environment Agency. Our compliance with these permits are covered by our planning objectives as outlined within the text.	Technical Report - section 5.1
57	District / Borough council	Cambridge City and South Cambridge District Councils	Measures to enhance the environment are also welcomed such as the priority for removing surface water entering the drainage system by the use of sustainable drainage systems (SuDS). SuDS which mimic natural drainage systems have many benefits for biodiversity and also amenity.	Support on the approach is noted.	-
58	District / Borough council	Cambridge City and South Cambridge District Councils	In planning for the delivery of key infrastructure, we consider it important to consider the 4 degree temperature rise scenario to ensure robust decision making and	Your concerns are noted. Following all stakeholder feedback we have continued with focussing on a 2 degree climate change scenario for the final DWMP. However, a 4	Technical Report - section 10.1

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			apply whole life costings to ensure that all possible measures to climate proof that infrastructure is taken. Our concern with only planning for a 2 degree temperature rise is that in the event that temperatures do rise above this level, this will lead to the need for costly retrofit of infrastructure to ensure that it can withstand such rises. We are of the view that it would be far more cost effective to plan for a higher temperature rise now.	degree climate change solution has been promoted in some catchments where best value planning showed this to be the most appropriate solution. Whilst planning entirely for a 4 degree scenario would be ideal, the impact on customer bills in the current financial climate, in combination with an current uncertainty to what extent a temperature rise due to climate change would look like may risk wasted investment and unnecessarily higher customer bills. As part of our LTDS we will explore the impact of a 4 degree climate change scenario through the Ofwat common reference scenarios. More information is provided within the text.	
59	District / Borough council	Cambridge City and South Cambridge District Councils	Whilst it is recognised that the draft DWMP covers a large region and a standard methodology has been used to reflect future growth, growth in Greater Cambridge may be higher than ONS data. In Greater Cambridge work is progressing on the Greater Cambridge Local Plan which will identify future development needs and how they will be met. The Councils have been engaging with Anglian Water to help inform plan making with regard to waste water infrastructure needs, and it is requested that this process continues so that effective solutions to accommodate development are identified and planned for.	Noted. We will continue to work with the councils to understand growth and impact on the area during business as usual.	-
60	District / Borough council	Cambridge City and South Cambridge District Councils	The Councils are fully supportive of the use of green solutions such as SuDS and wetlands and believe that these should always be the priority for the plan. These have multiple benefits, particularly where they mimic natural drainage and are at the surface. They are also key to integrated water management.	Support on the approach is noted.	-

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61	District / Borough council	Cambridge City and South Cambridge District Councils	To achieve the levels of surface water removal set out in the DWMP, Anglian Water will also need to retrofit existing development and it would be useful if the DWMP or a subsequent document could provide further detail about how this will be implemented and how other stakeholders will be involved in partnership working to achieve this.	More detail is provided within the text.	Technical Report - section 12.7
62	District / Borough council	Cambridge City and South Cambridge District Councils	The Councils support the removal of surface water from the sewerage system to reduce flooding, pollution and overflow spills. It is also important that this water is reused given the pressure on water resources in the East of England.	Support on the approach is noted.	-
63	District / Borough council	Cambridge City and South Cambridge District Councils	Given the challenging water resource situation in the east of England, Anglian Water should continue to explore opportunities for water reuse as part of its wastewater management and engage fully with Cambridge Water who deal with water supplies in the Greater Cambridge area. The Councils also seek confirmation that Anglian Water are engaging effectively with local bodies to ensure a comprehensive and shared understanding and commitment to the strategy for managing wastewater.	Noted. We will continue to explore and discuss opportunities, as well as remaining in contact with the relevant local bodies moving forward.	-
64	District / Borough council	Cambridge City and South Cambridge District Councils	Rivers are important for recreational use and are used for swimming and boating and there is great concern that at the moment this use poses a risk to public health. Investment in storm overflows and water treatment is vital for protecting river habitats and providing safe bathing waters and needs to be addressed as a matter of urgency. This will require engagement at local level with Local	Our storm overflow plan focusses on areas with highest environmental impact first which are led by trigger points outlined in DEFRA guidance. More details on our Storm Overflow plan is included within the text.	Technical Report - section 5.9

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			Authorities and communities about the investment choices required to realise this objective at a local level.		
65	District / Borough council	Cambridge City and South Cambridge District Councils	This is a complex high-level plan and more detail will be required to understand how it will be implemented. Anglian Water should consider how they can effectively convey this complex information to local communities.	We have produced a summary document for customers.	-
66	District / Borough council	Cambridge City and South Cambridge District Councils	The plan includes measures to increase capacity at Uttons Drove to accommodate development through surface water removal and new permits to increase capacity. The plan also notes that stakeholders are concerned about the implications of flooding in the area. The Councils seek reassurance from Anglian Water that they will identify effective solutions to address such risks and liaise effectively with local stakeholders including Parish Councils and the Swavesey Internal Drainage Board.	Discussions about Uttons Drove are on-going with all relevant stakeholders.	-
67	District / Borough council	Cambridge City and South Cambridge District Councils	Chalk streams/rivers should be prioritised, as an internationally important habitat which is being adversely affected by poor water quality. Areas where people are known to bathe or take part in boating, but are not necessarily designated bathing waters, should also be prioritised to protect public health.	Noted.	-
68	District / Borough council	Cambridge City and South Cambridge District Councils	There are no designated bathing waters in Greater Cambridge. However, there are areas where people are known to bathe and participate in boating. For example bathing between Grantchester and Newnham on the River Cam and intensive boating (punting, canoeing, paddle boarding and rowing) between Grantchester and Baits Bite Lock. Page 3 of the Technical Report indicates that waters known for wild swimming and recreation	Noted. We appreciate that non bathing waters can be just as important both environmentally and recreationally. Our storm overflow plan focusses on addressing the High Priority waterbodies first. Along with the EA and Defra definitions of high priority overflows, we included discharges into non-bathing waters but the waters are known recreational sites e.g. wild swimming, rowing clubs. Knowledge of this was reliant on stakeholders getting back to us	Technical Report - section 5.9

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			were considered in the prioritisation factors, and it is hoped that these areas were included and if not the Councils request that they are added.	via the Rivers Trust. We will look at opportunities of improving this data set ahead of PR29 for next round of improvements. More detail is outlined within the text.	
69	District / Borough council	Cambridge City and South Cambridge District Councils	The Councils agree that nature based solutions should be prioritised, particularly because of the multi-benefits of these for biodiversity, amenity and water quality. Sustainable Drainage Systems (SuDS) are fully supported by the Councils in new developments, and the recycling of water through rainwater harvesting and grey water recycling will be supported by including an integrated water management policy in the emerging Greater Cambridge Local Plan. Similarly, projects to increase wetlands and riparian vegetation such as tree planting alongside rivers is supported. Potential schemes and partnership working are set out in the Greater Cambridge Green Opportunity Mapping study (2021) which will be supported in a green infrastructure policy in the emerging Local Plan.	Noted.	-
70	District / Borough council	Cambridge City and South Cambridge District Councils	The Councils support partnership working and request that Anglian Water engage effectively with the Councils to help inform planning and plan making, and opportunities to support biodiversity and green and blue infrastructure.	Noted. We look forward to working with you.	-
71	District / Borough council	Cambridge City and South Cambridge District Councils	There is a need for immediate action to install Event Duration Monitors at all Storm Outflows to obtain accurate data and the Councils are supportive that the technical report states that the goal is to have all EDMs in place by the end of 2023.	Noted. We are on target to have all EDMs in place by the end of 2023.	-

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72	District / Borough council	Cambridge City and South Cambridge District Councils	The plan advises it is based upon addressing the priority sites for earliest investment which will have the most benefit for the environment and public health, but clearly the action is needed urgently, but the timeframes outlined to address issues are lengthy.	Agree that this is not a quick resolve. We will be meeting Defra targets and working within the cost allocation from Ofwat in our business plan.	-
73	District / Borough council	Cambridge City and South Cambridge District Councils	In the Technical Report, there is a section on growth which states that 'there will be some overflows where growth does impact the solutions required, and that these will be assessed and the growth will be incorporated and funded separately when any scheme is being completed'. This seems like a piecemeal way to assess the possible impacts of growth and that waiting until a scheme is being completed is too late in the process.	The assessment of any impact of growth on an overflow is completed when we receive notification of planning permissions, rather than post development completion.	-
74	Council - LLFA	Cambridge County Council	Cambridgeshire County Council have a 'Doubling Nature' ambition, as such we are anticipating the management of flood waters will increasingly take the form of nature-based solutions which will help to clean runoff and reduce the amount of water entering our existing network. We also anticipate solutions will be delivered in partnership and contribute to addressing wider concerns such as water scarcity.	Noted.	-
75	Council - LLFA	Cambridge County Council	Understanding the variations in different scenarios between 2, 4 or more degrees will mean that options can be developed that allow infrastructure owners to consider additional future adaptation required on their assets or put measures in place that do not inhibit future work and allow for unanticipated new development.	Agree. We have explored this within the DWMP and as part of our LTDS we will explore the impact of climate change scenario through the Ofwat common reference scenarios. More information is provided within the text.	Technical Report - section 10.1

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
76	Council - LLFA	Cambridge County Council	Would suggest the local knowledge {on growth} is matched as strongly as possible when looking at new settlements with a broader view for the expansion of existing settlements	Up to date growth information will be reviewed at least annually, with plans implemented to reflect updated information.	-
77	Council - LLFA	Cambridge County Council	The future maintenance of any green solutions needs to be considered fully and if public management of features is expected, communities will need to be equipped and funded accordingly.	Noted.	-
78	Council - LLFA	Cambridge County Council	Not all projects will result in partnership solutions but all should start with a partnership conversation and sense check of ambitions	Agree. We always welcome these partnership conversations.	-
79	Council - LLFA	Cambridge County Council	As discussed through the previous consultation stages, there are a number of locations which closely align with areas where the County Council have had reported flooding issues and we would be keen to work together with Anglian Water on trying to achieve multiple benefits and, with sufficient planning, attempt to attract external investment.	We would like to continue these discussions as we move into the delivery phase.	-
80	Council - LLFA	Cambridge County Council	We would especially be interested to understand if the need to address the SOs has the potential risk of impacting on the delivery of other work	All of our business needs will need to be managed within an affordability level as agreed with Ofwat.	-
81	Council - LLFA	Cambridge County Council	We understand Anglian Water's priority list was developed internally and shared with the Storm Overflows Technical Working Group (SOTWG) for an opportunity to suggest alterations. External consultation that appears to have taken place is with the Regional River Trusts which in Cambridgeshire includes the Cam & Ely Ouse (CamEO) catchment partnership, Water Care and the Upper & Bedford Ouse Catchment Partnership. We would agree that given the public health	Points around spill count vs ecological sensitivities are noted. We agree that environmental sensitivity is very important. The guidance ensures we focus on overflows in high priority areas.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			implications, bathing waters should be a factor in prioritisation. However we do not agree that further prioritisation should be based purely on the number of spills per annum. The location of spills can have far greater environmental and other impacts that should be considered in detail, recognising that these sensitivities may vary quite significantly across the region. However there remains a key point that a single spill in a sensitive location could have greater impact than multiple spills elsewhere.		
82	Council - LLFA	Cambridge County Council	It is our view that Anglian Water should go beyond these statutory targets with a view to bringing spills to as close to zero as possible and ahead of the 2050 target. Given that storm overflows to our watercourses and wider environment are an immediate and very real issue, measures that can be achieved quickly and effectively should be prioritised alongside developing nature-based solutions. Whilst the PR24 guidance for spill targets is to 'improve all storm overflows spills so they do not discharge above an average of 10 rainfall events per year by 2050', and certainly nature based solutions are a key part of this longer term strategy, this should not be taken to mean that short term challenges should not be addressed. We also note that whilst the consultation document explains the rationale for not incorporating any uplift for growth, this seems illogical in a region where growth is so significant and is of especial concern in Cambridgeshire, where previous and current levels of growth are already causing significant stress on the drainage networks.	We have to balance environmental benefit alongside the impact to customer bills. At the moment we feel that aiming to meet statutory targets is most appropriate, however this will be reviewed.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
83	Council - LLFA	Cambridge County Council	The County Council is already committed to delivering nature-based solutions to achieve multiple benefits. This will inevitably include the capture of surface water which would otherwise runoff into sewers and contribute to overflows. As an example, we are currently delivering two SuDS in Schools schemes to reduce the volume and rate of surface water entering Anglian Water’s sewer network. Provided Anglian Water seriously commit to working in partnership on nature-based solutions we would be a willing partner.	We look forward to working together.	-
84	Environment Group	Cambridge Green Party	The first time frame(over the next 25 years -i.e. to 2047) is presumably the longer term. The medium term, to 2035, is a period of 13 years. We suggest there shouldalso be a short-term scenario, given the extreme urgency of many of the priorities identified.	Medium term covers 2025-2035 and focusses on strategic planning. Existing issues are addressed through business as usual.	-
85	Environment Group	Cambridge Green Party	It would be irresponsible for Anglian Water not to use best available evidence for its climate change scenario planning, regardless of whether it is “cost beneficial” to do so.	We have explored this within the DWMP and as part of our LTDS we will explore the impact of climate change scenario through the Ofwat common reference scenarios. More information is provided within the text.	Technical Report - section 10.1
86	Environment Group	Cambridge Green Party	This will require keeping abreast of climate change research as the wastewater management plan evolves, and making any necessary adjustments if predictions change.	We will monitor the latest climate change information. The DWMP will be published again in 2028 where any changes will be identified if required.	-
87	Environment Group	Cambridge Green Party	We believe that Anglian Water and other providers in the area should be speaking out strongly against the planned levels of growth. For the purposes of business planning, however, it would seem prudent to assume the worst case scenario and plan for the highest predicted level of growth.	Noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
88	Environment Group	Cambridge Green Party	Any cost benefit analysis must be carried out on the basis of a full lifecycle assessment, taking into account not just short term financial costs but long term costs and benefits, including social and environmental ones. This approach is essential to maximise benefits to the environment and people, not all of which may be accounted for on a budget sheet.	We included several non-budget based benefits in our best value planning, including environmental benefit. You can find out more within the text.	Technical Report - section 6
89	Environment Group	Cambridge Green Party	priority to be given to chalk streams (those fed by groundwater from the Cam Chalk aquifer). Chalk streams are rare and precious habitats; the 225 in England represent some 85% of the world total	Our storm overflow plan focusses on areas with highest environmental impact first which are led by trigger points outlined in DEFRA guidance. Discharge within 50m of a Chalk streams is one of high priority factors recognised by the EA. Our prioritisation process has meant we are expecting to over deliver on the % high priority sites targeted for improvement by 2030. More details on our Storm Overflow plan is included within the text.	Technical report - section 5.9
90	Environment Group	Cambridge Green Party	All Sewage Treatment Works (STWs) must be fitted with Event Duration Monitors. With the anticipated increased and sudden rainfalls due to climate change, there must also be increased storm water storage capacity at STWs.	All of our storm overflows will have EDMs installed by the end of 2023 including those at our WRCs. Increasing stormwater storage capacity at our WRCs is a key aspect of our storm overflow spill frequency reduction plan.	-
91	Environment Group	Cambridge Green Party	All wastewater installations that discharge to Chalk streams should therefore be upgraded to end discharges of raw sewage and to reduce phosphate emissions to 0.5 mg/l. It is vitally important to address this in the plan with an immediate time frame.	Our discharge limits are calculated and permitted by the Environment Agency.	-
92	District / Borough council	Castle Point Borough	The prevention of sewer flooding must be a priority. Investment in the maintenance of and extension to the sewage network has not kept pace with demands. Consequently the risk of flooding is not just as a result of excessive	Being one of the planning objectives, sewer flooding is a strong priority. We have added in more information on our storm overflow strategy.	Technical Report - section 5.9

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			rainfall, but can occur at any time when there is a fault in the system. Pollution arising from storm overflows and pollution of watercourses more generally are critical issues due to the impact these can have on amenity, the quality of the environment and on biodiversity.		
93	District / Borough council	Castle Point Borough	Specific concerns in Benfleet and Canvey catchments are highlighted.	Issues have been raised with local teams. We will keep you up to date.	-
94	District / Borough council	Castle Point Borough	It is agreed that it is appropriate to make provision for a 2-degree temperature rise at this time. However, through its adaptive planning approach Anglian Water should be prepared to periodically review climate change evidence and adjust upwards their assumptions if the evidence indicates that this is needed over the 25-year plan period.	Support on approach is noted. We will re-issue the DWMP every five years, and take a view at this point on whether an alternative climate change scenario is appropriate.	-
95	District / Borough council	Castle Point Borough	It is appropriate to make provision for climate change now, as it is already happening as is evident from the extreme rainfall events that have been experienced more frequently across the UK including in Castle Point. In addition, the uncertainty of weather events, including drought, which creates its own pollution issues, means that infrastructure must be able to cope with rapidly changing weather events of variable impacts. Over engineering the system now will help mitigate climate change impacts.	Noted.	-
96	District / Borough council	Castle Point Borough	The Castle Point Local Plan was withdrawn in June 2015. That plan proposed a housing target in accordance with the standard methodology. Although a new plan may propose a lower than standard methodology housing target, in the absence of a plan, the standard methodology requirement should be used as a default, and this is the level of growth expected by	Noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			Government. If the new local plan proposes lower growth, then the use of the standard methodology requirement guarantees that growth is adequately catered for. The Council will engage with Anglian Water in the preparation of a new plan.		
97	District / Borough council	Castle Point Borough	In principle, if a green solution is the most appropriate and feasible solution it should always be selected as it will form part of the green infrastructure network in an area and have multi-functional environmental benefits in terms of shading, heat absorption, carbon absorption, biodiversity, amenity, and recreation, as well as drainage management. The Council in particular is supportive of tree planting, provided that any such planting is maintained especially whilst the trees are establishing.	Noted.	-
98	District / Borough council	Castle Point Borough	The Council expects that Anglian Water will consider the ongoing management and maintenance of green solutions that are provided in order to ensure that they are effective over the longer term in delivering drainage and wastewater management. It is also expected that Anglian Water will think carefully about the design of any such solutions to ensure that pollutants are managed and do not give rise to harm to ecology. All new development will be expected to provide separate sewerage and surface water drainage and it will be wholly unacceptable to the council for a green solution to in anyway act as a mitigation for sewerage waste products either on site or off site.	Noted. Detailed solution design will give consideration to all point raised.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
99	District / Borough council	Castle Point Borough	The solutions selected for each catchment need to be appropriate to the hydrology and topography in each area. Local stakeholders need to be satisfied that the creation of larger scale surface water storage areas will not place homes or property at risk. There also need to be a consideration of amenity impacts. The creation of large surface water storages areas may prevent recreational activities such as football occurring in some locations, especially if these areas are needed more frequently for storage due to climate change. There needs to be clear modelling and effective stakeholder engagement, including with existing users of any open spaces affected, before such proposals are progressed.	Noted. These discussions will occur during detailed solution design.	-
100	District / Borough council	Castle Point Borough	Locally, there is a Multi Agency Partnership for Canvey Island which has developed a Six Point Plan for improving the drainage and surface water flooding situation on the Island. This was in response to surface water flooding events in 2013 and 2014 which caused inundation to properties across the Island. Anglian Water alongside the Environment Agency, the LLFA and the borough council, has a key role to play in delivering that strategy and therefore partnership working is very much supported by the Council. ... Anglian Water is encouraged to work in partnership with ASELA to identify where the DWMP and proposals for SEE-Park overlap, and where the objectives of all parties can be maximised through joint working. As the Council prepares a new local plan, a firm partnership with Anglian Water is more crucial than ever. The Council will commit to continue its engagement with Anglian Water and other partners. This will be to ensure that Anglian Water fully understand the issues, constraints and opportunities in the borough;	Noted. We continue our support of the Canvey Island partnership.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			that we can work proactively to find the most effective and appropriate solutions; that we share local and technical knowledge; that we can plan the infrastructure requirements to meet future demands together; and we are able to raise concerns and issues with greater transparency.		
101	District / Borough council	Castle Point Borough	Storm Overflows which release raw sewerage into the environment should be avoided in all instances, with both bathing waters and river habitats protected equally in this respect. If it does occur adequate water quality monitoring should be in place so risks and harm can be clear accounted for, and Anglian Water held to account. It is noted that at this time, the River's Trust report that 70% of the discharge points in Castle Point are not monitored. This is not an acceptable situation, and the Council would welcome feedback on the timetable in place for getting monitoring equipment in place in advance of the legal requirement to do so in 2023.	We have updated our text to include our storm overflow strategy.	Technical Report - section 5.9
102	District / Borough council	Castle Point Borough	Following flooding in 2013 and 2014, a Multi-Agency Partnership was formed, and an integrated urban drainage model of Canvey Island was prepared. This allowed partners to identify a six-point plan for Canvey Island. Action 2 of the six-point plan relates to Canvey Lake. This is a significant component of the drainage infrastructure network for the central part of Canvey Island, providing storage capacity for surface water. During the flood event in 2014, this part of the network was overwhelmed. The responsibilities in relation to the lake are complex and involve several organisations including the Environment Agency, the County Council, the Borough Council and the Town Council. Anglian Water	Noted. We continue our support of the Canvey Island partnership.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			surface water drains feed into the lake and backed up during that event as capacity was exceeded. There is a need for all the relevant agencies to work together to ensure that there is sufficient capacity in the lake to accommodate future flood events. Partnership working is critical to overcome the complexity of responsibilities and it is therefore considered that the DWMP should include a commitment to partnership working on Canvey Island.		
103	District / Borough council	Castle Point Borough	The Council would therefore ask for Anglian Water to consider the need for network capacity increases to be included within the DWMP for the Canvey Island catchment in the medium term. The Council sought to raise this matter with Anglian Water during the consultation period and was provided with assurance that Anglian Water were committed to partnership working in terms of delivering the six-point plan. However, the amended words provided were too vague to be considered sufficient by Castle Point Borough Council and it seeks specific reference to 'partnership working through the Multi Agency Partnership to deliver the six-point plan' included within the DWMP. It is noted that the DWMP does include surface water removal for Canvey in the period to 2050.	We have re-run best value planning since the draft DWMP to incorporate all stakeholders comments. Following this update, Canvey Island is now included in the medium term in this final DWMP.	DWMP - section 18, South Essex CaBA Partnership
104	District / Borough council	Castle Point Borough	The proposals included for Rayleigh East and Southend catchments are welcomed in principle. Again, the Council would welcome discussions with Anglian Water to understand what these improvements will look like in practical terms and then again when proposals for these catchments are prepared to ensure that they will be effective in delivering better drainage and wastewater outcomes, and any	Agreed. These discussions will occur during detailed solution design.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			proposals for green solutions align with local proposals for green infrastructure enhancements in those areas. Effective ongoing engagement will be essential in developing local confidence in the ability of the DWMP to address risks in a timely manner.		
105	District / Borough council	Castle Point Borough	The Council notes that a key intervention proposed by Anglian Water is customer education....As a borough council we are also working on education pieces around surface water drainage. We are in the process of preparing information with the LLFA on driveways and how these should be designed and constructed to manage surface water runoff. Anglian Water's support for this would be welcomed.	Noted.	-
106	Regulator	CCW	Storm Overflows and sewer flooding are the most visible to some customers. But the company needs to draw on the findings of customer research to establish what the priorities are for its wider customer base. Internal sewer flooding is unacceptable in any circumstances because of its impact on the individuals and families who suffer.	We have completed further customer engagement since the draft DWMP. This is outlined in the text.	Technical Report - section 5.9
107	Regulator	CCW	Nature based solutions offer wider benefits than the range taken into account in water industry cost benefit analysis such as the benefit to society as a whole. Traditional solutions also tend to have a high carbon cost.	Support on approach is noted.	-
108	Regulator	CCW	We agree in principle to the removal of surface water from the sewerage system, subject to costs being reasonable and supported by customers.	Support on approach is noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
109	Regulator	CCW	We would expect the company to work with developers to ensure separation in all new developments. Other separation schemes need to consider opportunities for collaboration in areas at high risk of sewer flooding. The schemes should be paced to spread the cost.	We will be encouraging partnership working where possible to ensure we get the widest benefits in the most cost effective way for customers.	-
110	Regulator	CCW	While the company operates in a discrete area, it does not work in isolation and so must collaborate with others to ensure any national wastewater strategies are reflected in its plans. We also believe the company should engage with the community about what people think are the solutions to the problem.	Agree. We have outlined how we liaise with other strategies within the text.	Technical Report - section 10
111	Regulator	CCW	We would like to see the company develop their stakeholder engagement part of the plan further for the final plan and include likely bill impacts and the use of videos and clips to make the plan easier to access and understand.	We have published a customer facing document alongside our updated non-technical summary, technical summary and our online portal. Given the strategic nature of the document, rather than an investment plan, we feel that any bill impact assessment would be misleading. We will be reviewing strategic bill impacts as part of LTDS using the LTDS and Ofwat LTDS guidance Annex A2 to understand bill impacts of investments in the round.	DWMP online
112	Regulator	CCW	The plans lack an outline of the company's approach to misconnections, which we would have expected to be included in connection to the pollution that these caused.	Addressing misconnections is covered as part of our customer education solution, it will also be considered during detailed design as a method of removing surface water.	-
113	Regulator	CCW	Given the high profile and interconnectivity between the plan and EPA we feel that this needs to be addressed at some point in the text.	We have updated the text. Our EPA score has been identified as one of our measures of success.	Technical Report - section 10.6

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
114	Regulator	CCW	While the company say that “throughout the process we’ve consulted, discussed and co-created with our stakeholders to make sure that the plan we put forward” it is difficult to find evidence of this or a list of the organisations consulted. We believe that in order to foster good ongoing engagement in the future those who have contributed need to see a clear link between their feedback and a response from the company. While the company probably has discussed their approach with other water companies and a wide range of stakeholders there isn’t enough actual evidence that this has happened. It was also not it clear how the company had tailored communications for different types of stakeholders.	The final DWMP has included a list of all stakeholders contacted throughout the DWMP. We have outlined the level of engagement for each stage. And published this Statement of Response for transparency.	Technical Report - section 4.1
115	Regulator	CCW	The company do not seem to have used other forms of media as part of their engagement, such as video and animation.	We used a range of methods to engage with both stakeholders and customers, including video messages, email updates, face to face and virtual workshops, and online forums. We did not use animation but take this suggestion on board for the next DWMP.	-
116	Regulator	CCW	We agree in principle to the removal of surface water from the sewerage system, subject to costs being reasonable and supported by customers.	Noted.	-
117	Council - LLFA	Central Bedfordshire Council	We expect the DWMP demonstrate compliance to CBCs Water Cycle Strategy which considers the local impact of new planned development on water resources and AW infrastructure. The DWMP should make this clear/obvious an not rely upon CBC and other authorities to cross check between documents, the Water Cycle Strategy must therefore be shown to have been considered.	We have updated our text to reflect the link with WCSs.	Technical Report - section 5.6

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
118	Council - LLFA	Central Bedfordshire Council	What action can AW take outside of the development management process to remediate increased pressure on the AW network. This could be better defined in the DWMP.	We plan for growth and use the infrastructure charge to invest in the foul network when a growth impact is identified. This funding and investment mechanism sits outside of the development management process. However, due to the WIA and the automatic right to connect, regardless of capacity in the network. We still use the planning system to control and influence where those connections are made and to deliver on-site mitigation solutions (funded by AW). We rely heavily on the development management process to help ensure surface water connections to the public network are only ever a last resort. The WIA does not differentiate between foul and surface water sewers and the right to connect applies to surface water also. The development management process is the only way we can influence and control these connections into our network. In relation to WRC improvements, investment is funded via customer bills as legislation does not allow developer funds to be used. At times we are required to use the development management process as a way to phase development to allow us time to plan the required improvements. Whilst Anglian Water have an obligation to accommodate the growth we work with the Environment Agency to ensure protection of the water environment is not compromised.	-
119	Council - LLFA	Central Bedfordshire Council	How does the above forecast compare to recent flooding and observations on the (limited) capacity and performance of the AW network; and what action is AW taking to track the impact of growth on network performance against forecasts to ensure works may be scheduled as and when they are needed. In essence, how will the DWMP enable partners	We continually monitor our performance and report on this annually through our EPA score which is a key measure of success for the DWMP. We are installing thousands of sewer monitors during AMP7, which is set to continue in AMP8. These will allow us to further track and monitor capacity within our sewers.	Technical Report - section 10.6 and section 12

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			to monitor and work collaboratively in respect of new development and infrastructure improvements.		
120	Council - LLFA	Central Bedfordshire Council	We would like to see better engagement with CBC in the earlier stages of planning from AW in the areas of greater risk and known issues of capacity/spills, in order to incentivise developments to provide betterment.	Noted.	-
121	Council - LLFA	Central Bedfordshire Council	We encourage the use of green (and blue) infrastructure solutions by AW to match CBCs own aspirations for the application of these to address water stress, projected water shortages and biodiversity loss. It is unclear (in the DWMP and consultation) what criteria comprises cost benefits in this instance (i.e. is this limited to customers better protected from internal flooding), the criteria should be cohesive with environmental objectives to ensure spend and investment are aligned to achieving benefits associated with green solutions, not achievable through grey infrastructure.	The text within our best value planning section has been updated.	Technical Report - section 6
122	Council - LLFA	Central Bedfordshire Council	Maintenance of green and blue infrastructure/solutions will need to be addressed by the DWMP, in pursuit of AWs integration of these in problem solving. AW should consider the need to outline in the DWMP the adoption of a natural capital and/or biodiversity offset approach to manage, monitor and enhance the area's natural environment.	In relation to WRC improvements, investment is funded via customer bills as legislation does not allow developer funds to be used. At times we are required to use the development management process as a way to phase development to allow us time to plan the required improvements. Whilst Anglian Water have an obligation to accommodate the growth we work with the Environment Agency to ensure protection of the water environment is not compromised.	-
123	Council - LLFA	Central Bedfordshire Council	Removal of surface water from the sewer system should not increase flood risk elsewhere, mitigation of the impacts of	Agreed and noted. We would not implement a solution which caused an issue elsewhere.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			re-directing surface water must be provided by Anglian Water in achieving this objective and AW held accountable for demonstrating this.		
124	Council - LLFA	Central Bedfordshire Council	We consider AW should show the level of investment and resource commitment in the DWMP to facilitate partnership working, equally and consistently, across their catchment and partners.	The level of funding available will be approved by Ofwat through our next business plan.	-
125	Council - LLFA	Central Bedfordshire Council	We suggest a spatial online tool for identifying catchment based approaches and interventions, to accompany the Plan and its subsequent implementation, and that these may be filtered by administrative area.	Noted. A mapping project is currently being looked into. We will continue to work with partners throughout the development stage.	-
126	Council - LLFA	Central Bedfordshire Council	We would like to see a comprehensive review of all areas considered inclusive of why they have been discounted or the approach behind measurements for targets i.e. 50% or 25% removal from the sewer. We appreciate this may be separate to the Plan document to keep it concise, however require that the full range of supporting technical assessment is signposted to and made available to ensure transparency of objective setting/delivery.	All catchments were shared with stakeholders following RBCS which outlined why catchments progressed through or not. We are happy to re-share this if requested. The measured targets were driven through modelling as outlined in the text. Again we're happy to share and discuss this separately.	Technical Report - section 5.8
127	Council - LLFA	Central Bedfordshire Council	The following areas identified by CBC as being at increased risk of flooding (sewer and surface water): Blunham, Wrestlingworth, Eaton Bray, Maulden, Shefford, Stotfold/Arlesey (as downstream catchment of urban Letchworth), Toddington, Houghton Regis, Harlington, Meppershall, Henlow and Langford, Stanbridge and Tilsworth. We ask that the above be reviewed and communications provided to CBC to demonstrate how these were/not accounted for in the setting of DWMP spatial objectives.	All areas, with the exception of Blunham and Houghton Conquest, fall within sewerage catchments which progressed through the DWMP. These areas are covered by: Bedford, Chalton, Clifton, Clophill, Dunstable, Flitwick, Letchworth, Leighton Linlade, Poppyhill, Shillington, Tempsford and Wrestlingworth. Blunham and Houghton Conquest are covered by Great Barford and Kempston Hardwick respectively and neither catchments progressed through the initial RBCS.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
128	Regulator	Environment Agency	We haven't seen a clear statement of what the plan will deliver in terms of performance outcomes i.e. what residual risk of flooding (internal/external/extreme) will remain? Also there is nothing showing the relative performance of your draft preferred and alternative plans that shows the performance across all the core benefits, and how these relate to the customer preferences for each	This information will be provided in the data tables.	-
129	Regulator	Environment Agency	The EA have requested confirmation that the DWMP caters for both future growth and addresses the "infrastructure underinvestment of the past" as well as infrastructure being resilient to flooding and coastal change by 2030.	The BRAVA stage reviewed our current baseline level of risk, with solutions seeking to either ensure no worsening or an improvement. A new section on flooding resilience has been added in the text.	Technical Report - section 9
130	Regulator	Environment Agency	The EA have stated that they expect that the DWMP will clearly set out how AW will be meeting the targets set out in the Storm Overflows Discharge Reduction Plan.	Noted. We have since completed our Storm Overflow Discharge Reduction Plan consultation and updated the text.	Technical Report - section 5.9
131	Regulator	Environment Agency	The EA encourage co-development with key stakeholders and a request to note that the FCERM Strategy Roadmap to 2026 contains actions that will provide support on this.	Noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
132	Regulator	Environment Agency	The EA specifically identified certain strengths of the DWMP: <ul style="list-style-type: none"> · strong enagement with examples of how feedback was incorporated into the plan; · the use of BVP framework which encourages the company to take wider social and environmental benefits into account during decision making; · the high percentage of green solutions within the preferred option; · clear linkages to business planning; · the removal of surface water at source using NBS within the long-term startegy; and · positive links to the Anglian Water dWRMP. 	Thank you for identifying where you thought our DWMP was particularly strong. These have been noted.	-
133	Regulator	Environment Agency	There is a lack of clarity over how suggestions and concerns raised by stakeholders were acted upon.	Every attempt was made to clearly show how our wide stakeholder engagement fed into shaping the DWMP, something that you specifically pulled out as being a strength of the document. However, we have noted your dissapointment that certain suggestions were not taken onboard. Whilst we did listen to and then consider the points raised by all stakeholders, as with all strategic documents it is not possible to incorporate every single suggestion made. We hope this Statement of Response provides some further clarity.	-
134	Regulator	Environment Agency	There is a lack of detail surrounding the formation of the 17 Tactical Planning Units.	The decision to go with the 17 CaBA partnership areas was made with stakeholders during our launch workshop. This is outlined further in the text and within the Strategic Context online.	Technical Report - section 4.3
135	Regulator	Environment Agency	There is a lack of consideration for the fluvial and tidal flood risk posed to the networks and assets.	We have completed further resilience work since the draft DWMP. This is outlined in the text.	Technical Report - section 9

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
136	Regulator	Environment Agency	There is a lack of explanation as to why surface water source control was scoped out from being a medium and long term measure in many catchments.	Noted. Surface water source control (rural) was mainly scoped out due to uncertainty on feasibility, however it is still a solution we would investigate if further information arose and was identified as a potential through some of the stakeholder workshops.	-
137	Regulator	Environment Agency	There is lack of inclusion of the planning and assessment to address stormwater overflows done by AW in developing the Get River Positive schemes.	The DWMP is 2025-2050, whereas Get River Positive has mainly 2025 ambitions. However, we have included further explanation within the text.	Technical Report - section 10.1
138	Regulator	Environment Agency	There is a lack of inclusion of the investment in 100% storm overflow monitoring and continuous water quality monitoring that Anglian Water have committed to carry out by December 2023.	This was not included as the plan refers to works from 2025 onwards. However we can confirm that all EDM monitors will be in place by December 2023. Continuous flow monitoring is mentioned in the new WINEP section.	Technical Report - section 10.2
139	Regulator	Environment Agency	There needs greater details over how climate change allowances and future growth have been incorporated.	Text has been updated throughout the document with regards to climate change and growth.	-
140	Regulator	Environment Agency	Details regarding the solutions for those Water Recycling Centres with Technically Achievable Limits at the end of AMP7 are lacking.	These sites have been reviewed, alongside WINEP targets. We are aware there are a number of WINEP obligations where there is a potential conflict between growth and environmental protection. We have raised this within the text and have identified alternative solutions where possible. Where we have been unable to identify a suitable alternative solution, we will seek to work with the Environment Agency to find a suitable solution to allow growth whilst protecting the environment.	Technical Report -- section 10.2
141	Regulator	Environment Agency	There is the lack of a conclusion to the Environmental Assessment which would set out what the likely environmental effects would be from the plan.	Due to the high level strategy of the DWMP it has not been possible to complete a full Environmental Impact Assessment. Any potential impact to the environment will be assessed at detailed scheme design.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
142	Regulator	Environment Agency	Although there is support for the promotion of SuDS for surface water source control, we also suggests adopting a cautionary approach within certain catchments where the headwaters of the watercourses are reliant upon the Final Effluent flows from the Water Recycling Centres. Concern is raised that the proliferation of SuDS could reduce the necessary sustainable flow and suggested that this could impact upon AW's ability to be compliant with regards to Dry Weather Flows (DWF), suggesting that we may want to look at alternative mitigation options.	Concern is noted and catchments will be considered on a case by case basis with a detailed review following any promotion for investment. We do believe that the use of SuDS on the whole is the most sustainable option that should not impact our ability to remain compliant.	-
143	Regulator	Environment Agency	An additional technical appendix with more detail of the BVP framework with details how costs and benefits were calculated and weighted would be helpful to provide more transparency. The £3.5bn arising from the use of the BVP will be dwarfed by the expenditure on storm overflows.	We have extended the text within the document.	Technical Report - section 6
144	Regulator	Environment Agency	Stakeholders, including the Environment Agency, will be interested in understanding how Anglian Water will track identification of risks and delivery of solutions within DWMPs and their success at mitigating risks.	We have a number of measures across the business to monitor our success, including our ODI performance and EPA rating.	-
145	Regulator	Environment Agency	it was unclear how the appraisal method determined when and where nature-based solutions were considered cost-beneficial. Some detail of aligning investment over the 25-year period to mitigate future risk, with £1.49bn invested in the first 10 years, the plan should have accounted for all business priorities that are accounted for at PR24.	We have extended the best value planning text within the document. The DWMP focusses on the ten planning objectives. Wider business priorities are considered separately and alongside the DWMP as part of PR24.	Technical Report - section 6
146	Regulator	Environment Agency	Beyond a simple short/medium/long term, there are no clear timescales or clear prioritisation of the proposed implementation	We have tried to make the DWMP as transparent as possible, noting that the plan will adapt with on-going monitoring.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			of mitigation measures. The draft DWMP does not make it clear if, or where any upgrades are required, or increases in capacity are necessary.		
147	Regulator	Environment Agency	there seems to be no recognition of current or imminent non-compliance, and therefore no short-term measures. It seems hard to imagine that there are no immediate priorities requiring consideration within the short-term measures of the DWMP.	Immediate concerns are highlighted during the BRAVA phase. These lead to the interventions highlighted.	-
148	Regulator	Environment Agency	There is a lack of detail to consider if proposed WRC solutions are correct, with some like Corby and Reepham proposing a new permit with increased capacity, which in singularity would not be an acceptable solution. In the case of Corby, there is a question about the ability of a culvert which lies just downstream from the outfall from the WRC to accommodate the extra flows which would result from a significant increase in capacity.	Feasibility of solution was considered during the optioneering phase. Where we were aware certain solutions would not be possible these were discounted. In the case of Corby we feel that this is still a feasible solution at this point in time, acknowledging that we have some wider issues requiring discussion before potentially discounting.	-
149	Regulator	Environment Agency	Particularly within the Broadland Catchment Partnership in the Draft DWMP 'new permit' is mentioned for some works - but this is not possible for many that will be at TAL soon for P and are close to/ exceeding DWF, such as Whitlingham.	We are aware there are a number of WRCs where there is a potential conflict between growth and environmental protection either due to existing TAL limits, Nutrient Neutrality or WINEP drivers. We have raised this within the text and have identified alternative solutions where possible. Where we have been unable to identify a suitable alternative solution, we will seek to work with the Environment Agency to find a suitable solution as continued discussions on how to address this will be key to unable growth in Norfolk, and other areas, whilst protecting the environment.	Technical Report - section 10.2 and section 10.5
150	Council - LLFA	Essex County Council	Planning for a 2 Degree temperature rise up to 2050 is reasonable, given the projected temperature increase over this period.	Noted. The plan will be re-produced in five years time and we will re-assess the climate change requirement during that process.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			However, with an upper limit of 4 Degrees temperature rise expected by 2100 it would be prudent to begin building in resilience for this increase sooner, rather than later. We would suggest including a mid-term review (2035) of climate change projections to see how these are trending. If greater than expected, then consideration should be given to revising planned Climate Change increases from 2 degrees Celsius to 4 degrees Celsius.		
151	Council - LLFA	Essex County Council	We would suggest a recurring 5year review of ONS forecast Vs local plan to see how planned development figures are trending with forecast growth and the DWMP investment approach reviewed/ updated accordingly.	Noted. The plan will be re-produced in five years time and we will re-assess the climate change requirement during that process.	-
152	Council - LLFA	Essex County Council	Consideration should also be given to water resources and drought protection by treating/ storing/ re-using surface water run-off within the catchment area, being mindful of the necessary water volume requirements for sustaining the local river network at an acceptable level.	We have worked with the WRMP team to identify overlaps where possible however we acknowledge more work can be done in this area going forward.	-
153	Council - LLFA	Essex County Council	Encourage the daylighting of surface water sewers to increase capacity and realise wider environmental benefits including habitat creation, biodiversity enhancement, wetland areas, etc.	Noted. It is a solution that will be considered further when we get to detailed optioneering.	-
154	Council - LLFA	Essex County Council	Work with Essex County Council to identify properties that have suffered internal property flooding (DG5 records) to inform capital scheme delivery location and Property Flood Resilience (PFR) delivery.	We will continue to liaise with you during business as usual activities.	-
155	Council - LLFA	Essex County Council	The DWMP should mention the importance of integrating Green Infrastructure (GI) as a mitigating measure to help address or mitigate drought/ water stress and to improve	Green infrastructure is a primary focus of the DWMP, regularly chosen through the best value planning approach, with it being a supported solution by stakeholders and informed by	Technical Report - section 6.2

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			the water quality of watercourses. GI is mentioned briefly in the plan but should be more widespread throughout the plan is key focus area.	customer preference. Whilst the benefits highlighted are not explicitly mentioned in the document, they are acknowledged.	
156	Council - LLFA	Essex County Council	Working collaboratively with catchment partners and key stakeholders to incorporate green infrastructure, such as schools, can help reduce water demand and manage water resources providing long term benefits to help reduce water scarcity.	Agreed. We are actively looking to identify these opportunities and welcome further discussions.	-
157	Council - LLFA	Essex County Council	It is also important work is done in consultation with farmers, alongside improving water treatment, to reduce the amount of harmful fertilisers heading into watercourses which is having a significant negative effect on the quality of water. The best place to manage this is at source.	We will continue to engage with the NFU throughout the process.	-
158	Council - LLFA	Essex County Council	Nature based solutions will also help to mitigate impacts of climate change going forward & achieve greater holistic water management to help with preventing flooding and adding to existing water stores for utilisation in times of drought.	Noted.	-
159	Council - LLFA	Essex County Council	ECC is also always looking for opportunities to deliver Natural Flood Management and NBS across Essex. Collaborative working should be an integral part of this project where jointly-funded opportunities should be sought to achieve the greatest amount of benefit for authorities and the local community.	Noted.	-
160	Council - LLFA	Great Yarmouth Borough Council	2 degrees temperature rise seems a sensible approach based on the data.	Support for approach is noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
161	Council - LLFA	Great Yarmouth Borough Council	{Green infrastructure} should always be the first option considered where achievable to prevent future flooding and overloading of systems.	Noted.	-
162	Council - LLFA	Great Yarmouth Borough Council	There seems to be little mentioned on the Caister catchment area within the detail of the document, other than partnership working. Is there a reason for this?	More information has been provided about Caister within the A WINEP section. We will continue to review the catchment and continue to work in partnership. We were unable to go into lots of detail for each catchment/offer discussion section for each catchment given the volume of them, but would welcome enquiries about catchments.	Technical Report - section 10.2
163	Council - Planning	Greater Cambs	Reducing pollution, minimising pollution incidents from storm overflows and as a result improving the water quality should also be a key priority for the DWMP and be implemented as soon as possible.	Noted.	-
164	Council - Planning	Greater Cambs	Our concern with only planning for a 2 degree temperature rise is that in the event that temperatures do rise above this level, this will lead to the need for costly retrofit of infrastructure to ensure that it can withstand such rises. We are of the view that it would be far more cost effective to plan for a higher temperature rise now.	Your concerns are noted. Following all stakeholder feedback we have continued with focussing on a 2 degree climate change scenario for the final DWMP. However, a 4 degree climate change solution has been promoted in some catchments where best value planning showed this to be the most appropriate solution. Whilst planning entirely for a 4 degree scenario would be ideal, the impact on customer bills in the current financial climate, in combination with an current uncertainty to what extent a temperature rise due to climate change would look like may risk wasted investment and unnecessarily higher customer bills. As part of our LTDS we will explore the impact of a 4 degree climate change scenario through the Ofwat common reference scenarios. More information is provided within the text.	Technical Report - section 10.1

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
165	Council - Planning	Greater Cambs	Whilst it is recognised that the draft DWMP covers a large region and a standard methodology has been used to reflect future growth, growth in Greater Cambridge may be higher than ONS data.... The Councils have been engaging with Anglian Water to help inform plan making with regard to waste water infrastructure needs, and it is requested that this process continues so that effective solutions to accommodate development are identified and planned for.	Noted. We will continue to work with Cambridge councils to ensure we are on the right track for needs in the area during reviews of the DWMP.	-
166	Council - Planning	Greater Cambs	The Councils are fully supportive of the use of green solutions such as SuDS and wetlands and believe that these should always be the priority for the plan. These have multiple benefits, particularly where they mimic natural drainage and are at the surface. They are also key to integrated water management.	Support for approach is noted.	-
167	Council - Planning	Greater Cambs	To achieve the levels of surface water removal set out in the DWMP, Anglian Water will also need to retrofit existing development and it would be useful if the DWMP or a subsequent document could provide further detail about how this will be implemented and how other stakeholders will be involved in partnership working to achieve this.	We have included more information around partnership working within the text.	Technical Report - section 12.7
168	Council - Planning	Greater Cambs	The Councils also seek confirmation that Anglian Water are engaging effectively with local bodies to ensure a comprehensive and shared understanding and commitment to the strategy for managing wastewater. This includes bodies such as Internal Drainage Boards, and working to address concerns such as those highlighted around Uttons Drove.	Discussions about Uttons Drove are on-going with all relevant stakeholders.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
169	Council - Planning	Harborough District Council	This is a complex high-level plan and more detail will be required to understand how it will be implemented. Anglian Water should consider how they can effectively convey this complex information to local communities.	We have produced a summary document for customers as well as completing some specific customer engagement work over the past few months. This is outlined more within the text.	Technical Report - section 4.8
170	District / Borough council	Harborough District Council	Asset capacity should also be considered as the increased reliance on storm overflows leads to the pollution of waterways.	Increasing capacity, e.g., increasing storm water storage capacity is one of the key strategies planned for our storm overflow spill reduction plan as outlined in the text.	Technical Report - section 5.9
171	District / Borough council	Harborough District Council	The authority has noted concerns in the dDWMP regarding the capacity of the WRC covering the Harborough area, especially during dry weather and requests to be kept up to date regarding planned upgrades and the timing of works schedules.	Noted. We will continue to keep in touch with Harborough district council about our developments and plans for any improvements in your area.	-
172	District / Borough council	Harborough District Council	The population data for Market Harborough and the district as a whole should reflect the 2021 Census data.	The DWMP was completed using a prior forecast, however we annually review with the most up to date information, of which the 2021 Census data is included.	-
173	District / Borough council	Harborough District Council	Should be aiming for water neutrality in areas of the greatest growth, it is important to change consumer behaviour and take up SUDs where as much as possible.	Noted.	-
174	District / Borough council	Harborough District Council	The DWMP has addressed the risks but have the scale of risks been assessed and the weighting they hold? Have the interdependencies of risks been considered?	We have looked at the benefits for each solution across a range of measures. We have updated our best value planning information in the text	Technical Report - section 6
175	District / Borough council	Harborough District Council	The authority welcomes AW's commitment to partnership working regarding the catchment for the River Welland.	We look forward to working together.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
176	Regulator	Joint regulator response	We expect to see detail in your final DWMP regarding how and when your storm overflow plan will meet all targets and milestones in accordance with Defra's Storm Overflow Discharge Reduction Plan across AMPs, including the requirement to monitor the water quality impact of storm overflows. This includes meeting targets for bathing and shellfish waters.	Our storm overflow reduction plan focusses on meeting the guidance as set out in Defra's Storm Overflow Discharge Reduction Plan. Based on feedback with external stakeholders we are planning to go beyond this with our Get River Positive pledges. At the time of DWMP publication, we are still awaiting guidance from the Environment Agency on the requirement and scale of any water quality monitoring programme.	-
177	Regulator	Joint regulator response	In accordance with our feedback on draft DWMPs, we also expect companies to provide clarity on how they will meet these {SO} targets through all drainage and wastewater activities, not just enhancement / WINEP needs, separating out maintenance / optimisation solutions and costs from the total risk and investment needs.	As with other elements of the DWMP we have considered a hierarchy of solution types to address need. We have only included enhancement investment to deliver spill reductions caused by hydraulic incapacity. Where hydraulic models identify the cause of spills to be due to maintenance, this will be funded through maintenance investment in AMP8.	-
178	Regulator	Joint regulator response	It is concerning that you state 'there is still a high level of uncertainty around many of our overflows'. While it is not clear exactly what you mean by 'uncertainty', and you are likely not the only company in this position, we expect final DWMPs to provide as accurate a position as possible regarding the full extent of the interventions needed to meet the storm overflow targets, but also what the outstanding uncertainties and assumptions are and how these will be addressed. This includes evidence of how you have ascertained the numbers and costs for investigations and screening requirements.	We have included a further explanation within the text.	Technical Report - section 5.9
179	Regulator	Joint regulator response	We consider that investigations undertaken as late as AMP9 would compromise optimal adaptive planning and long-term decision-making. We note that in your WINEP	WINEP outlines the investigations required to be confident around the impact of a storm overflow. The investigations outlined the in the DWMP are referring to investigating the root	Technical Report - section 5.9

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			submission you have included all your overflows for investigation in AMP8, ensure your DWMP aligns with your WINEP.	cause of spills and investment prioritisation to 2050. We will have EDMs on all overflows by December 2023 so will know all places we need to invest by 2027. The text has been updated to clarify.	
180	Regulator	Joint regulator response	We would welcome prioritisation of nature-based solutions / sustainable drainage systems over traditional 'grey' solutions to remove surface water from the network to deliver multiple benefits. However, you must communicate how engagement, partnership, deliverability and demonstrating best-value has influenced these options.	Noted.	-
181	Regulator	Joint regulator response	We expect final DWMPs to provide greater granularity of solutions, costs, and benefits to deliver storm overflow targets, both within the plan itself and through the accompanying DWMP data tables. We have also previously explained how we expect to see comparative costs and benefits for different options (e.g., grey and/or green solutions, least cost or best value), particularly when it comes to assessing options within business plans.	We have identified costs as outlined within the text.	-
182	Regulator	Joint regulator response	It is also important that companies' design methodologies are informed by observed datasets, for example current Event Duration Monitoring (EDM), future near-real time EDM reporting and continuous water quality monitoring. The Environment Agency and Ofwat are concerned about your reliance on models that are uncalibrated / poorly validated to underpin investment decisions. If an industry-recognised alternative modelled approach is being used, clearly set out your plan for ensuring the continued validity of modelled outputs until more EDM datasets	We have included in the text our approach between using EDM or modelled data in our strategic planning. Where there is a mismatch between EDM and modelled data we are reviewing the models. Further model verification will be completed before final solution design.	Technical Report - section 5.9

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			are available. Ensure your assessments are robust and confidently reflect root causes of spills.		
183	Regulator	Joint regulator response	Finally, we expect to see appropriate 'signposting' against your statement of response for all consultees to be able to identify their comments and where you have accounted for them in your final DWMP. This should also include all stakeholder responses to this additional consultation on storm overflows.	Noted. We have aimed to transparent within this Statement of Reponse.	-
184	District / Borough council	Maldon District Council	4 degrees would give more of a 'worst case' scenario and might save having to update the plan in terms of climate change as early. Reading literature on climate change such as the IPCC report 2021, limiting temperature rise to 1.5-2 degrees is becoming increasingly out of reach. If we can achieve this, then 2 degrees is the right approach, however 4 degrees may be more realistic.	Your concerns are noted. Following all stakeholder feedback we have continued with focussing on a 2 degree climate change scenario for the final DWMP. However, a 4 degree climate change solution has been promoted in some catchments where best value planning showed this to be the most appropriate solution. Whilst planning entirely for a 4 degree scenario would be ideal, the impact on customer bills in the current financial climate, in combination with an current uncertainty to what extent a temperature rise due to climate change would look like may risk wasted investment and unnecessarily higher customer bills. As part of our LTDS we will explore the impact of a 4 degree climate change scenario through the Ofwat common reference scenarios. More information is provided within the text.	Technical Report - section 10.1
185	District / Borough council	Maldon District Council	Local plans may not be up to date so it will be more robust to use both datasets.	Agreement with approach is noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
186	District / Borough council	Maldon District Council	When feasible, green solutions should be the main options implemented. Whilst green solutions should be the most desirable option, it is acknowledged that costs have to be taken into account also.	Agreement with approach is noted.	-
187	District / Borough council	Maldon District Council	It must be ensured that there is sufficient and effective maintenance otherwise it will end up more costly and defeat the purpose of removing the surface water.	Noted.	-
188	District / Borough council	Maldon District Council	It would have been useful if you had identified possible partners, or types of partner, to work with.	We have included all partners we have engaged with throughout the DWMP. Any of these organisations would be great partners.	Technical Report - section 4.1
189	District / Borough council	Maldon District Council	The plan is quite generic in places, for example not going into detail as to how the medium term and 2050 strategies for each area will be achieved. For example, stating '10% surface water removal' in Burnham-On-Crouch as the 2050 strategy, there is no indication as to how this will be achieved. Will there be any proactive actions taken to achieve this?	Where a 2050 strategy outlines surface water removal this has been modelled as the most appropriate solution to meet the risk. Detailed optioneering to achieve these will be identified as the risk materialises.	-
190	District / Borough council	Maldon District Council	For many areas in the Maldon District, it appears no partnership opportunities have been identified, why is this? And where they have been identified, who is this with, who has been approached?	This would have been due to stakeholders not identifying opportunities during our option development workshops. Whilst they might not have been identified at present, we will still seek to work with partners if new opportunities arise.	-
191	District / Borough council	Maldon District Council	The focus should be on all high priority areas, however focusing on bathing waters will be beneficial in terms of human health.	We have reflected this within our text.	Technical Report - section 5.9
192	District / Borough council	Maldon District Council	We will continue to work with you through consultations such as these and would welcome any engagement.	Support noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
193	IDB	Middle Level Commissioner IDB	A regular criticism of water companies is that they are business and so concerned with making money rather than dealing with problems. Scenario 3 would seemingly support this case i.e. that the cheapest solution is best. It is appreciated that Anglian Water is regulated by Ofwat and that customer charges need to be kept low but as all RMA's are aware "cheap is not always cheerful" and enquire whether "value for money" or a similar phrase would be more appropriate.	For the draft DWMP we chose a midrange plan that offered a balance between cost and benefit, following best value planning. Our plan incorporates the solutions which most regularly were picked by the optimiser across the core plan scenarios, as outlined in the text. If a solution was selected in the least cost plan then it would only have been selected in the best value plan if it had been chosen in the majority of scenarios. We have updated our text to demonstrate the costs depending on scenarios.	Technical Report - section 12.8
194	IDB	Middle Level Commissioner IDB	Infiltration Removal - The problems associated with infiltration of the sewer system, particularly within foul and combined systems are known and are not surprising given that most of The Fens features a high water table particularly during the winter months. Presumably lining the sewers concerned or similar prevention methods would alleviate much of the problem?	Infiltration removal (relining sewers) has been selected as a feasible option where cost beneficial.	-
195	IDB	Middle Level Commissioner IDB	It is considered that in an ideal world it would be appropriate for all RMA's to prepare for the worst case scenario {climate change} and there is an aspiration to achieve this. However, conversely this could be expensive, may prove unnecessary and wasteful leading to criticism from the parties involved. It is suggested that the most economic and environmentally acceptable standard should be achieved.	Noted. We will review when we re-publish the DWMP in five years time.	-
196	IDB	Middle Level Commissioner IDB	When planning to accommodate future growth targets it is appropriate to consider what is known using the best information available at the time, for example, allocated sites in the appropriate development plans. Preparing plans based on conjecture is inappropriate, could be expensive, may prove unnecessary	Noted. We will review when we re-publish the DWMP in five years time.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			and wasteful in the long term. It is suggested that the most economic and environmentally acceptable standard should be achieved.		
197	IDB	Middle Level Comissioner IDB	Adequate arrangements MUST be made to ensure that the long-term ownership funding, management and maintenance for the upkeep of any green infrastructure, whether on or off site, in perpetuity is achieved.	Noted.	-
198	IDB	Middle Level Comissioner IDB	As the approval and consent of other RMA's may also be required prior detailed consultation with the parties involved MUST be undertaken and agreed BEFORE work commences.	Noted.	-
199	IDB	Middle Level Comissioner IDB	The Commissioners and associated Boards are prepared to work in partnership with the local community, private and public partners to contribute to and deliver schemes for conservation, navigation, water resources, water level & flood risk management where there is a mutual benefit to the partners concerned. However, to what extent they are prepared to contribute would be the subject of a decision for the respective authority and this may vary dependent upon their views.	Noted.	-
200	IDB	Middle Level Comissioner IDB	The surcharging of or high discharges during or following high rainfall events. These include the discharges from WRC's at Doddington, Manea - Town Lots, March, Over and the systems serving them.	We invite discussion for these particular sites to further understand concerns.	-
201	IDB	Middle Level Comissioner IDB	in general, it is considered that all the current targets {storm overflows} are too vague and will take too long to achieve any meaningful results.	We are following Defra guidance as set out in the Storm Overflow Discharge Reduction Plan.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
202	IDB	Middle Level Comissioner IDB	There are several references to the points of discharge within the document but their locations are not readily identified in the report in the same way was the WRC's identified within the RBCS/BRAVA process. Therefore, it is not known how it is expected to provide meaningful comment upon these matters.	Due to the level of investigation required over the next couple of years, at this stage we have not broken down plans for each individual overflow. We have published our storm overflows on our website, which outlines our spills as well as confirmed investments. We are creating a version 2 of this map following feedback from customers and stakeholders. This version will include the 2022 dataset and the MP areas and will be released in April 2023. Our approach to storm overflows is updated in the text.	Technical Report - section 5.9
203	IDB	Middle Level Commissioner IDB	It should be noted that: a. Most of the Commissioners and associated Internal Drainage Boards are pumped systems which can often remain stationary for extended periods and does not "flow" in the normal manner and thus dilution may not occur as expected. b. The overflows discharging into the upstream of both the River Nene and Ouse catchments will have an adverse impact on the downstream areas of interest covered by the Commissioners and associated Boards. The discharge from Flag Fen and other WRC's, which discharge into the River Nene system, forms a significant part of the water which the Commissioners abstract at Stanground. c. It must also be noted that water from the Commissioners and other local systems is abstracted to protect the local aquatic environment; agricultural use, including the washing or irrigating crops for consumption; to provide amenity and in the near future to provide a potable water supply.	Noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
204	IDB	Middle Level Comissioner IDB	Reference is still being made to discharges into rivers. As previously advised not all discharges from the public sewer system are into “rivers”, particularly within the “fenland” environment.	Comment noted. Text has been updated throughout.	-
205	IDB	Middle Level Comissioner IDB	Neither the Boards or the Commissioners receive “compensation” for having to receive, transfer and dispose of the discharges from the overflows.	Noted.	-
206	IDB	Middle Level Comissioner IDB	It is considered that these targets should apply to all sites not just high priority ones, with solutions implemented much sooner than identified if the Governments targets of halting biodiversity decline is to be achieved and the goals of the Water Framework Directive and the 25 year environment plan are to be achieved	Targets apply to all overflows but the priority impacts the timeframe.	-
207	IDB	Middle Level Comissioner IDB	This Board {Hundred Food Washes}, being ecologically sensitive, holds National and International status as a protected site. As such it is particularly sensitive to the quality of water which floods in from upstream of Earith. This water quality can (and does) have a marked impact on the flora and fauna. Therefore, the Board area should be considered in all discharges into the Ouse.	Noted.	-
208	IDB	Middle Level Comissioner IDB	due to the complex man managed systems within the Fens the impact of development in the upstream catchments has adverse impacts on the downstream systems and this MUST be accounted for as future growth occurs.	Noted.	-
209	IDB	Middle Level Comissioner IDB	The Board would of course be prepared to “work” with AW in order to mitigate problems, although we do not have a budget for this.	We look forward to working with you.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
210	IDB	Middle Level Comissioner IDB	The reasoning behind the inclusion of Designated Shellfish Water and Designated Bathing Water as trigger points is noted and understood. However, there does not appear to be any appreciation that vast quantities of water are abstracted from Fenland water level management systems for agricultural use, whether this is washing or irrigating crops for consumption within the food chain. Therefore, it is considered that it would be prudent for the trigger points to be reviewed to include those other items which could affect public health on a wider scale.	This is outside of Defra's guidance but something we may include during our assessment.	-
211	IDB	Middle Level Comissioner IDB	Storm overflows will not be permitted to discharge above an average of 10 rainfall events per year by 2050. This target should be more defined and any solutions achieved much sooner than identified.	We will be implementing solutions in a phased approach over the next few AMPs, focussing on high priority areas to begin with, as per guidance.	-
212	IDB	Middle Level Comissioner IDB	The text infers that "typical" rather than excessive rainfall events are being used to predict spills and storage volumes but no reference appears to be made to Standards of Protection (SoP) or the impacts of climate change.	An allowance for climate change has been made within the assessment of risk to storm overflows. This is outlined within the text.	Technical Report - section 5.9
213	IDB	Middle Level Comissioner IDB	It is also uncertain of any adverse impacts that are created by several storm overflows being in close proximity to each other such as those that discharge into the Old River Nene in March.	The guidance requires us to review the storm overflows on an individual basis. However upon devliery we will likely review these with a more catchment approach.	-
214	IDB	Middle Level Comissioner IDB	As advised previously, it is considered that in an ideal world it would be appropriate for all RMAs to prepare for the worst-case scenario and there is an aspiration to achieve this. However, conversely this could be expensive, may prove unnecessary and wasteful leading to criticism from the parties involved. It is	Noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			suggested that the most economic and environmentally acceptable standard should be achieved.		
215	IDB	Middle Level Comissioner IDB	The first paragraph refers to continual engagement with your customers but there appears to be limited engagement with those RMA who have to receive the flows from the storm overflows. It is suggested that such engagement commences and both the Commissioners and associated Boards look forward to continual engagement and transparency on storm overflows and networks in the future.	We look forward to working with you.	-
216	IDB	Middle Level Comissioner IDB	<p>a. Nature Based Solutions, such as the use of SuDS, wetlands and other green structures, for the removal of excess surface water and/or ground water/infiltration is considered to be an appropriate option in the correct circumstances and location where suitable land is available.</p> <p>However:</p> <p>i. Adequate arrangements MUST be made to ensure that the long-term ownership funding, management and maintenance for the upkeep of any green infrastructure, whether on or off site, in perpetuity is achieved.</p> <p>ii. Consideration needs to be given to any restrictions upon maintenance of the drainage “facility” due to the presence of protected habitats and species.</p> <p>iii. As the approval and consent of other RMA’s may also be required prior detailed consultation with the parties involved MUST be undertaken and agreed BEFORE work commences.</p> <p>b. Such facilities could be considered as “green” or “blue spaces” the benefits of which are well documented when placed either within</p>	Noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			the surrounding countryside or within urban areas and spaces, to improve the populations wellbeing, and physical and mental health. c. They could contribute to Biodiversity Action Plans (BAPS) undertaken by the Commissioners, other Boards and RMA within your company's area which would assist species and habitats and provide wider biodiversity benefits.		
217	IDB	Middle Level Comissioner IDB	Support could be provided by providing local knowledge of the respective systems, assistance in identifying and achieving suitable locations for SuDS facilities, meeting biodiversity targets, reduction in carbon footprints, achieving net zero etc. There may be other benefits but not knowing the location of these potential sites it is difficult to comment definitively or "guide" any development proposals when they are received.	Noted. We will review when we re-publish the DWMP in five years time.	-
218	Council - LLFA	Milton Keynes City Council	We are anticipating the management of flood waters will increasingly take the form of nature based solutions which will help to clean runoff and reduce the amount of water entering our existing network. We also anticipate solutions will be delivered in partnership and contribute to addressing wider concerns such as water scarcity.	Noted.	-
219	Council - LLFA	Milton Keynes City Council	Would suggest looking at a range of changes {climate change} where possible, potentially to assess the sensitivity of a given area on different changes to allow the development of adaptable plans.	We have considered solutions for no impact, 2 degrees and 4 degrees climate change. We will review our strategy in five years time when re-publishing the DWMP. As part of our LTDS we will explore the impact of climate change scenario through the Ofwat common reference scenarios. More information is provided within the text.	Technical Report - section 10.1

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
220	Council - LLFA	Milton Keynes City Council	Would suggest the local knowledge is matched as strongly as possible when looking at new settlements with a broader view for the expansion of existing settlements.	Noted.	-
221	Council - LLFA	Milton Keynes City Council	We would suggest incorporating a target {for green infrastructure}... to provide a driver for partnership working to create assets that provide multiple benefits and to encourage innovation, also to increase the viability of these types of solutions in the long term and build experience.	Whilst a target has not been included in the DWMP it is being considered further within the business.	-
222	Trade association	National Farmers Union	We recognise that working in partnership with water companies, putting in place nature-based solutions could provide an opportunity and attractive source of diversified income for agricultural businesses. However, we also recognise that these sorts of environmental markets are in their early stages of development and could carry significant risks to these businesses, with intergenerational implications. The NFU has identified 5 key principles https://www.nfuonline.com/updates-and-information/environmental-markets-the-nfu-s-5-key-principles/ which if met, could help to ensure emerging environmental markets prove attractive for farmers and growers to engage in with confidence over the long-term.	The principles are noted but are outside of DWMP scope.	-
223	Trade association	National Farmers Union	The NFU continually works to support and engage with government and stakeholder groups to offer support and input on a range of challenges facing the water environment. Working to determine the most appropriate methods of support to enable farming businesses to make improvements to their local water environment.	We are looking forward to working with you more.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			<p>By working with other sectors Agriculture and horticulture can become more resilient to not only extreme weather risk but also reducing the risk of water pollution.</p> <p>The development of stakeholder relationships creates opportunities to promote multi-sector schemes where farmers, water companies, energy companies and others can share the benefits of activities to improve water quality. Working together to fund innovative solutions to the challenges being faced and produce beneficial environmental outcomes.</p>		
224	Trade association	National Farmers Union	<p>Operating in an open and transparent manner that offers the ability for agricultural stakeholders to engage in the subsequent process is vital.</p> <p>The NFU has worked to support catchment based approaches that look at the improvement of the water environment. Farmers can play a key role in the development and deployment of solutions that offer a wide range of benefits. However, the onboarding of agricultural participants should be done in a way that allows them the opportunity to share their knowledge to help form the model for improvement.</p>	Agree. We look forward to working with you.	-
225	Trade association	National Farmers Union	<p>Any proposed target {on SOs} must have a clear baseline, be achievable, measurable, and affordable. Consultation with those that may be impacted by, expect to contribute to achievement of any targets is key, and socio-economic trade-offs must also be designed into the early stages of the target-setting process to assess the costs versus the benefits on specific sectors. Sufficient reward to agricultural businesses is vital to ensure that any changes are offset in relation to the business impact.</p>	Noted and agreed.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
226	Trade association	National Farmers Union	In relation to the water environment, water quality monitoring locations have been determined historically, with little flexibility to alter sampling location if valid concerns are raised regarding the degree to which the sample location accurately represents water quality in the wider catchment. The NFU believes opportunity should be given to create the optimum water sampling network to give farmers and others confidence in the data.	A wide scale river monitoring programme completed by water companies is currently under consideration by the Environment Agency. We are awaiting further guidance.	-
227	Council - LLFA	NE Lincs	Given the shared priorities of partners across the region it will be essential that we all work together to address issues. The availability of resources and the policies behind the different organisations can complement each other to ensure more effective and efficient delivery of plans, with benefit to customers across the region.	Agreed.	-
228	Council - LLFA	NE Lincs	It feels as though the higher value {for climate change} should be used considering the lack of progress world wide on tackling climate change, and the seemingly recent acceleration of climate change. So a more pessimistic outlook long term should be applied. 2 degrees should be used for the medium term if possible.	Your concerns are noted. Following all stakeholder feedback we have continued with focussing on a 2 degree climate change scenario for the final DWMP. However, a 4 degree climate change solution has been promoted in some catchments where best value planning showed this to be the most appropriate solution. Whilst planning entirely for a 4 degree scenario would be ideal, the impact on customer bills in the current financial climate, in combination with an current uncertainty to what extent a temperature rise due to climate change would look like may risk wasted investment and unnecessarily higher customer bills. As part of our LTDS we will explore the impact of a 4 degree climate change scenario through the Ofwat common reference scenarios. More information is provided within the text.	Technical Report - section 10.1

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
229	Council - LLFA	NE Lincs	The numbers in the Northern Becks catchment seem to be low.	Our approach to understanding future growth is outlined in the text. Our planning team work closely with councils to ensure we capture local differences to the regional plan. If there are any concerns around particular areas of the strategy then we would be keen to discuss further.	Technical Report - section 5.6
230	Council - LLFA	NE Lincs	Green solutions should be used wherever possible, not just on a cost basis, as there are a number of additional benefits that the green features bring to the environment, and society as a whole.	Noted. We selected green solutions where they were shown to be the best value option, this took into account a range of wider benefits alongside cost.	-
231	Council - LLFA	NE Lincs	Partnership working should be utilised whenever possible, we have successfully delivered a number of flood risk management schemes in partnership with both the EA and AW.	Agreed, we look forward to continue to work with you.	-
232	Council - LLFA	NE Lincs	We feel that there needs to be more attention to Grimsby/ Pyewipe, that they have been overlooked.	We have tried to contact to discuss this further. Whilst this hasn't been picked up for the final we will continue these discussions to ensure any concerns are incorporated during business as usual.	-
233	Council - LLFA	Norfolk County Council LLFA	Investing in separate sewerage systems would be first move, but then taking inflows out of existing combined and foul systems where constraints hinder installation of separate systems is crucial.	Noted. This level of solution preference was collected during the optioneering stage and fed into the stakeholder preference section of best value planning.	-
234	Council - LLFA	Norfolk County Council LLFA	Sharing knowledge, resources, funding and agreeing long term management of assets is critical to effective delivery of schemes.	Agreed.	-
235	Council - LLFA	Norfolk County Council LLFA	Does the future strategy look at investment where groundwater infiltration or ingress is a main problem for a Level 3 catchment? Or even screening areas where this is more likely to occur? ... So as per removal of surface water	We highlighted where we had known issues with high groundwater levels but more can be done to map this across the region. Preventing groundwater from entering the sewer is one of our solution options under "reduce infiltration".	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			from sewers, the same level of investigation and investment should also be considered with groundwater.		
236	Council - LLFA	Norfolk County Council LLFA	All new or upgraded WRC's should have polishing areas where water could be polished and then maybe stored for agriculture rather than discharging back to rivers, these polishing areas should aim to meet governments BNG targets and its welcomed that wetlands are becoming more popular on WRC sites.	This is currently beyond guidance but is an area we can look to work in partnership with in the future.	-
237	Council - LLFA	Norfolk County Council LLFA	Businesses must be preparing for winter and summer extremes. {Support 2 degree temperature rise}. Appropriate Climate change allowances for 2050 using central allowances. But does depend on the design life of the asset.	Agreement with approach is noted.	-
238	Council - Planning	North Northamptonshire Council	The 2 degree temperature increase seems the most appropriate to select over a 25 year period.	Agreement with approach is noted.	-
239	Council - Planning	North Northamptonshire Council	The Council would like clarification on the data that was supplied, this would have been through the previous local authorities. Please can you advise of the data that you have used for North Northamptonshire.	Discussed through a meeting.	-
240	Council - Planning	North Northamptonshire Council	Using the Local Plan provided data is likely to give a more certain future outlook based on site allocations for development and knowledge of the local area. In the past ONS forecasts have not always been appropriate as they haven't taken into account the levels of growth identified in some areas.	Noted.	-
241	Council - Planning	North Northamptonshire Council	Green solutions can offer multifunctional benefits and would be the most appropriate option in many cases. These can often be cheaper than hard engineering and provide	Agreement with approach is noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			other natural capital benefits. It would be sensible to prioritise the green solution when possible and for these to be considered for every project, and assessment done of the cost and benefits when considering wider societal benefits.		
242	Council - Planning	North Northamptonshire Council	Removing surface water into other SuDS would be the most appropriate way of managing wastewater flows and also allow for wider environmental benefits to be secured from water management.	Agreement with approach is noted.	-
243	Council - Planning	North Northamptonshire Council	Partnership working in catchments is a proven way of securing wide ranging benefits and also by engaging the local community allows for more acceptable solutions. Different organisations in a partnership can contribute and share information in different ways to provide a better solution that meets a wider range of organisational priorities. Collaboration can also help bridge funding gaps using collective contributions to bring schemes forward.	Agreement with approach is noted.	-
244	Council - Planning	North Northamptonshire Council	The Council will welcome partnership working within North Northamptonshire and the catchments that cover the area.	We look forward to working together.	-
245	Council - Planning	North Northamptonshire Council	The plan addresses a range of risks through to 2050 however, there doesn't seem to be any mention of changes to employment land and manufacturing over this time period. In North Northamptonshire and other areas there is great pressure for logistics and more employment land to be delivered. Would this have any impact on water recycling catchments, or do they provide a way of mitigating other pressures in themselves, or	Discussed through a meeting.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			the landscaping on developments to incorporate SuDs. This may need some consideration moving forward.		
246	Council - Planning	North Northamptonshire Council	One of the examples given in section 12 is to apply for new environmental permits from the Environment Agency as a strategy to cope with an increase in pressure. Without the detail it isn't known what the implications of this would be, but on the face of it, it doesn't appear to put environmental or social prosperity first.	An environmental permit is issued by the EA to ensure that we are protecting the watercourse. We are happy to discuss this in more detail.	-
247	Council - Planning	North Northamptonshire Council	It would be good to see more detail for the relevant catchments based in our area and what plans there are for the water recycling centres.	Given the regional scale of the plan we have not provided significant detail at a catchment level. However we are happy to discuss certain catchments where relevant.	-
248	Council - Planning	North Northamptonshire Council	There are 2 partnership opportunities identified in Islip and Raunds, it would be good to know what these involve.	More details on how we identified partnership opportunities have been outlined in the text. For Raunds these are an EA project on culverts, and the potential to work with farms to 'slow the flow' from field runoff.	Technical Report - section 12.7
249	Council - Planning	North Northamptonshire Council	Further dialogue on the Broadholme catchment would be welcomed, especially as we progress with the North Northamptonshire Strategic Plan. The long-term plans for 10% surface water removal are supported but we would like to know more detail on this considering the size of the catchment.	Discussed through a meeting.	-
250	Council - Planning	North Northamptonshire Council	The Council has to produce a statutory document called the Local Nature Recovery Strategy, there could be clear benefits in looking at nature based solutions for surface water to link into habitat creation and enhancement in some areas. The Council also has evidence with Habitat Opportunity Mapping that may be useful to identify areas	Discussed through a meeting.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			that would most benefit from solutions to provide multiple benefits. We would be happy to discuss this further.		
251	Council - Planning	North Northamptonshire Council	Further information would be welcomed on the apparent lower level of investment for the Nene Catchment compared to the levels of growth anticipated.	Discussed through a meeting.	-
252	Council - Planning	North Northamptonshire Council	We would like information on how pollution and flooding incidents will be dealt with in timely ways, the response from relevant stakeholders including Anglian Water should be proactive and supportive of people that may have unfortunately been impacted by flooding incidents.	Discussed through a meeting.	-
253	Council - Planning	North Northamptonshire Council	Priority is to minimise impacts on the environment by preventing or reducing the numbers of flooding and sewage incidents from taking place. Where rainwater management needs to be improved to eliminate the majority of surface water using the sewage network, this should be prioritised to prevent associated issues and pollution from occurring.	Noted.	-
254	Regulator	Ofwat	You should publish the report to include supplying a customer facing document, a non-technical summary and a technical summary for your final DWMP.	We have published a customer facing document alongside our updated non-technical summary, technical summary and our online portal.	-
255	Regulator	Ofwat	We consider that your general approach to planning and risk assessments is well developed, with the inclusion and discussion of most common planning objectives, and two additional bespoke objectives based on stakeholder engagement.	Noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
256	Regulator	Ofwat	We are concerned that it does not include clear plans to address storm overflows.	The plan for storm overflows have been included in the final DWMP. Following stakeholder consultation in February 2023.	Technical Report - section 5.9
257	Regulator	Ofwat	You have presented the ten planning objectives into "Planning objective themes", however we are concerned that these themes were not treated as measurable and fully costed objectives you should demonstrate what the specific targets of each planning objective or theme, when they will be delivered and what impact it will have on customers. It is also unclear how each objective theme had been prioritised.	We believe the data within the data tables should address this. Objective themes were not prioritised over each other.	-
258	Regulator	Ofwat	An explanation of how to use the portal effectively was limited, and the data being visualised was not fully clear to what it was, or where it came from.	The website has been updated with further user information.	-
259	Regulator	Ofwat	There was a lack of prioritisation and on detail of what risks are required to be addressed by different time periods. We are also unclear on what proportion of your network or population required interventions by each time period.	The DWMP is purposefully higher level to enable adaptability. The data tables address a more granular breakdown.	-
260	Regulator	Ofwat	You should clearly set out how asset management and optimisation (base expenditure activities) can address some risks, such as, providing additional hydraulic headroom in the system, as part of a hierarchy of options, before recommending enhancement schemes.	The text has been updated.	Technical Report - section 5.8
261	Regulator	Ofwat	We note the work undertaken on the RBCS, with seventeen risks analysed including two additional risks being included after being highlighted by stakeholders... we are encouraged by the collaboration with stakeholders to develop your DWMP.	Noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
262	Regulator	Ofwat	There was a lack of sufficient and convincing evidence for the 'best value' plan. It is also unclear what best value metrics were chosen and what process you applied for selecting them. You should also provide sufficient evidence demonstrating why alternative options were discounted.... You should in your final plan quantify the multiple benefits solutions.	We have updated our text within the best value planning section.	Technical Report - section 6
263	Regulator	Ofwat	You have not provided an estimated cost for a best value or least cost scenario to allow comparison between investment scenarios.	We have now included a high level overview of the least cost scenario as a comparison to our best value plan. However we consider this plan to leave a considerable level of risk of poor performance to our customers.	Technical Report - section 12.8
264	Regulator	Ofwat	In your final plan you should provide clarity on how nature-based ambition will be realised and, where applicable, why green options are not being pursued.	Our process outlining our best value planning approach identifies the benefits used in our solution selection.	Technical Report - section 6
265	Regulator	Ofwat	Your DWMP lacked detail on the types of partnership schemes you have identified. It is also unclear if and how these opportunities will materialise. In your final DWMP you should provide further detail on the likelihood of your partnership schemes going ahead, including timelines for delivery and the split in funding contributions, and be clear on the rationale for not progressing such schemes, where applicable.	More details on our identified partnership opportunities have been outlined in the text. Additional information is within the data tables.	Technical Report - section 12.7
266	Regulator	Ofwat	You should fully address the Defra storm overflow reduction plan targets, including costs and timeline for completion in your final DWMP.	Our approach to storm overflows has been included in the text.	Technical Report - section 5.9

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
267	Regulator	Ofwat	Your dDWMP does not reference water quality improvements, or the required water quality monitoring of storm overflow spills from the Environment Act 2021. You should demonstrate the how you understand the scope of work required to resolve "ecological harm". This should include the expected expenditure to install the required water quality monitors, along with the timescale to deliver the installation programme.	Our approach to storm overflows has been included in the text. At the time of DWMP publication, we are still awaiting guidance from the Environment Agency on the requirement and scale of any water quality monitoring programme.	Technical Report - section 5.9 and section 10.2
268	Regulator	Ofwat	The DWMP Guiding Principles and the Defra storm overflow discharge reduction plan state that companies are expected to consider green infrastructure, nature-based and low-carbon solutions to mitigating risks, where possible... You should provide clarity on this in your final DWMP, along with the rationale, where applicable, as to why green options have been discounted.	Our approach to storm overflows has been included in the text.	Technical Report - section 5.9
269	Regulator	Ofwat	Costs should indicate the impact on affordability of bills. We note that your DWMP does not provide potential bill impacts for 2030 and 2050 in your region. You should provide the potential impact on customer bills in your final DWMP and out the costs required to address yours and your customers' priorities.	Given the strategic nature of the document, rather than an investment plan, we feel that any bill impact assessment would be misleading. We will be reviewing strategic bill impacts as part of LTDS using the LTDS and Ofwat LTDS guidance Annex A2 to understand bill impacts of investments in the round	-
270	Regulator	Ofwat	We are concerned that your DWMP included no base and enhancement split for expenditure. You should clearly set out what improvements can be achieved through base funding prior to additional enhancement expenditure.	This is identified through the data tables commentary.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
271	Regulator	Ofwat	We note that you have not provided your view or set out the storm overflows costs, or other significant investment schemes in your draft DWMP submission... In your final plan you should provide clarity around the timeline and costs required to deliver against these targets.	Storm overflows are now included following our consultation. Given the adaptive nature of the plan we don't feel there are any significant investment schemes that require separate identification.	Technical Report - section 5.9
272	Regulator	Ofwat	There was no specific breakdown of costs for each element of the DWMP themes, or planning objectives. We note that costs were only presented at a high level, and no specific catchment, scheme, or outcome level costs were provided.... You should include a specific breakdown of costs for each planning objective, with an indication of when they will be required, in your final DWMP.	We believe the data within the data tables should address this.	-
273	Regulator	Ofwat	It is unclear what weight the company places on each benefit type and how you are monetising each benefit. You should clearly state in the final DWMP how these best value elements are assessed, and the scale of additional benefits that can provided.	Text has been updated.	Technical Report - section 6
274	Regulator	Ofwat	We are encouraged that you are using adaptive planning and scenario testing in attempt to identify a low-regret programme for AMP8. It is noted that you are using some of the common reference scenarios for demand and climate change. Whilst there is no detail on specific trigger points, it shows some understanding of the aims of adaptive planning.	Noted.	-
275	Regulator	Ofwat	In your final DWMP you should include more detail, including specific trigger points, and use a range of scenarios to optimise investment needs against a range of likely futures. This should also include the common reference scenarios.	We have updated to demonstrate comparison against alternative scenarios.	Technical Report - section 12.8

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
276	Regulator	Ofwat	We acknowledge the wide-reaching engagement that you have done to seek the endorsement from different strategic partners and stakeholders.	Noted.	-
277	Regulator	Ofwat	It is unclear how many of these collaboration opportunities are likely to be prioritised and go ahead. You should provide better detailed evidence of partnership opportunities' timescales and the level of contribution by the different parties involved in your final DWMP.	Text has been updated. An example are also provided in the data tables.	Technical Report - section 12.7
278	Regulator	Ofwat	We note that you have demonstrated how stakeholder engagement has shaped elements of your plan and have further engagement planned over 2022 and 2023 to feed into the final DWMP. You should consider the responses to your dDWMP consultation and explain how these have influenced your final DWMP.	This Statement of Response outlines our position based on feedback to the dDWMP.	-
279	Regulator	Ofwat	We note that you have provided a Board statement for your dDWMP and that "Plan 3" is endorsed by your Board as the best balance between ambition, risk and customer bill impact. However, your dDWMP does not address the storm overflow reduction plan as was requested in the joint letter and therefore does not meet all the defined DWMP requirements.	Post dDWMP our assurance programme considered storm overflow reductions, as well as the final plan. Our updated Board Assurance Statement is published alongside this final DWMP.	-
280	Regulator	Ofwat	We are encouraged by the external assurance of "three key processes", however it was not fully clear as to what the processes were or what the outcomes of the external review were. You should ensure that a full Board Assurance statement is also provided as part of your final DWMP submission, and we would welcome confirmation of any additional assurance provided on your final plan.	We have continued to have further assurance between draft and final DWMP. Our updated Board Assurance Statement is published alongside this final DWMP.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
281	Environment Group	RSPB	A 2 degree increase seems appropriate based on current predictions for the plan period. However, these should be kept under review and revised as new evidence develops.	Support for approach is noted.	-
282	Environment Group	RSPB	Growth should only be encouraged in areas where it is appropriate and the necessary measures can be put in place to ensure that there will not be environmental harm caused by the additional development. We appreciate the challenge this poses for AWS, but there will need to be some tough choices made in the future over whether sufficient water resource is available for new development and whether increased discharges could have serious consequences for ecosystem services and the public goods that these provide.	The Sustainable Growth Team liaises with local planning authorities as they prepare Local Plans and other development plans to inform growth within the Anglian Water Region. As a statutory consultee we seek to positively engage with Councils as they prepare evidence to support the spatial distribution of growth in their areas, and seek to inform the direction of growth where there is available headroom and less carbon intensive solutions to providing new infrastructure.	-
283	Environment Group	RSPB	Whilst there may be good reasons for some action not being possible in the short term, this should not impact on investment ambition and decisions over the medium and long term.	Noted. We will continue to monitor risk and implement where required to ensure ambition is met.	-
284	Environment Group	RSPB	Working in partnerships brings together wide-ranging experience and expertise that can help deliver greater benefits. Resources can be pooled to get more from projects. It also avoids efforts being duplicated. Many stakeholders have landscape-scale visions and objectives and partnership working allows complementary work to be joined up and enable greater impact where we can work together.	Noted.	-
285	Environment Group	RSPB	Focussing on bathing waters will deliver fewer benefits and not deliver much needed action to restore favourable conditions and Good Ecological Status of watercourses and associated water bodies.	Noted. We will focus efforts on storm overflows starting with those causing the highest environmental impact.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
286	Environment Group	RSPB	It is not clear that the scale of work will be appropriate or that the appropriate resources will be put in place to support the environmental aspirations.	Comment is noted. We will be reviewing the DWMP every five years, and will continue engagement without throughout the process.	-
287	Environment Group	RSPB	Whilst the plan may set out enough information about “what” is needed to be done, more information on the “how” this will be delivered.	When a scheme is promoted for investment it will undergo rigorous detailed solution discussions. It is not possible to include this level of detail in this strategic plan.	-
288	Environment Group	RSPB	There s a huge amount of work happening around future management of water resources and resource protection yet the governance of this vast amount of work, much of which is happening at pace, is unclear and challenging for stakeholders to engage. There needs to be strong links made to each of these pieces of work to ensure they are joined up.	We are working to ensure overlaps within water and water recycling systems are highlighted and utilised where possible, but note that as mentioned this is still a developing area.	-
289	Council - Planning	South Norfolk Council and Broadland District Council (Planning)	Within this plan-making context we trust that the planned growth that has been identified (and discussed with Anglian Water in your role as statutory consultee) has been reflected in the programme of strategies included within the dDWMP consultation document. We have identified some locations where growth is being planned, but for which there appears to be no commensurate proposal in the dDWMP, therefore we welcome opportunities for ongoing engagement relating to this, including further discussions about the identified and predicted growth in the area to inform the emerging strategy.	Our approach to understanding future growth is outlined in the text. Our planning team work closely with councils to ensure we capture local differences to the regional plan. If there are any concerns around particular areas of the strategy then we would be keen to discuss further.	-
290	Council - LLFA	Suffolk LLFA	Multifunctional SuDS should be prioritised wherever possible, with emphasis on the multifunctional aspect to achieve the four pillars of SuDS. SuDS are often more cost beneficial than traditional approaches, we	Noted. We agree that it is important to consider whole life cost in addition to capital cost; this is why we included WLC as one of the benefits within our Best Value Planning process, with the optimisation tool instructed to suggest	Technical Report - section 6

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			would hope that this assessment does not just consider the capital cost but the whole life cost of any proposed mitigation	plans which minimise WLC alongside maximising positive benefits. You can find this within the text.	
291	Council - LLFA	Suffolk LLFA	Does this include current projections for climate change? If not, this is not as resilient as it would first appear.	We have reviewed all catchments against a variety of climate change solutions. Our final plan has resilience to a 2 degree increase in climate change. The text has been updated to reflect the climate change approach.	Technical Report - section 12.8
292	Council - LLFA	Suffolk LLFA	Secondly, new developments are being permitted to discharge to AW SW sewers at agreed discharge rates during 1:100+CC. If your sewers cannot and will not be able to deal with this event, then discharge to the SW sewer could be increasing offsite flood risk, if not through flow rates, potentially through flow volumes.	We expect developers to design to attenuate on site to a 1 in 100+CC storm before being able to discharge into our network. The pipe is designed to take up to 1 in 30 year storm, although modelling has shown that we can often accommodate more.	-
293	Council - LLFA	Suffolk LLFA	We do not understand how you have identified the current catchments for partnership working. In Suffolk, we see there is significantly more potential for partnership working than what the dDWMP identifies.	Partnership opportunities were identified with stakeholders during the DWMP workshops, of which all councils were invited to. We acknowledge there are likely to be multiple opportunities available in areas that due to attendees remit were not discussed during these meetings. We're keen to ensure we identify as many partnership opportunities as possible and welcome ongoing engagement in this area.	-
294	Council - LLFA	Suffolk LLFA	Further partnership working is certainly encouraged as flooding does not differentiate between sources and will often require a joined up approach to resolve in its entirety, rather than addressing in part.	Noted.	-
295	CaBA	Upper & Bedford Ouse Catchment Partnership	Planning for a 2 degree rise seems sensible for the period to 2035, but needs to be in the context of re-assessing this if knowledge	Support on approach is noted.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			changes. We also need to ensure that all potential rainfall variations are included within this.		
296	CaBA	Upper & Bedford Ouse Catchment Partnership	With likely additional growth in the Anglian Water area, with many Local Plans requiring Review in the short term to accommodate higher growth, we feel that the higher end of the range should be used, not a mid-point. The work of the Ox-Cam Integrated Water Management Framework should guide such predictions.	Your concerns are noted. Following all stakeholder feedback we have continued with focussing on a mid point growth scenario for the final DWMP. Whilst planning entirely for a Local Plan scenario would give us a worst case view, there would be an impact on customer bills and in the current financial climate may risk wasted investment and unnecessarily higher customer bills. As part of our LTDS we will explore the impact of a higher demand scenario through the Ofwat common reference scenarios. More information is provided within the text.	Section 10.1
297	CaBA	Upper & Bedford Ouse Catchment Partnership	On all occasions when feasible, due to the multiple benefits they [SuDs] will deliver. Decision-making on feasibility should take account the cost-benefit of these wider benefits, such as improvements in water quality.	We have considered a range of benefits when looking at all suitable options. Improvement in water quality are difficult to assess at this strategic level but will be considered more during design optioneering.	-
298	CaBA	Upper & Bedford Ouse Catchment Partnership	[On working with partners] we fully support this and would welcome further discussions, in both te opportunities identified in our area and wider collaborative planning.	Support on approach is noted. We look forward to working with you.	-
299	CaBA	Upper & Bedford Ouse Catchment Partnership	Given there are no official bathing waters in the UBO catchment, our priority would be protecting river habitats. We do note however the increase in recreational use of waterbodies such as the Great Ouse, for watersports including swimming, and therefore feel that the designation and protection of bathing waters is an emerging priority even in landlocked catchments.	We understand the importance of river use for recreational purposes and inland bathing waters is one of our Get River Positive goals. We have included more about this within our text.	Technical Report - section 10.1

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
300	CaBA	Upper & Bedford Ouse Catchment Partnership	We are relatively confident that the right risks have been identified, but not confident that the level of investment is sufficient to effectively address these across the catchment.	Concerns are noted.	-
301	CaBA	Upper & Bedford Ouse Catchment Partnership	The draft DWMP is a move in the right direction, but the level to which 'green' or nature based solutions are adopted, alongside the yet to emerge approach with regard to Storm Overflow discharges, will be the basis on which we can answer this question with a full and less qualified 'yes'.	Concerns are noted. We look forward to working with you as we move into business as usual.	-
302	District / Borough council	Uttersford District Council	Nature based solutions are likely to be more sustainable over a longer period and ultimately more adaptable.	Noted.	-
303	District / Borough council	Uttersford District Council	We have a climate change officer and climate change working group with Members who could be engaged on storm water/ecology/nature based solutions discussions or (pilot) projects.	Noted, we look forward to working with you.	-
304	District / Borough council	Uttersford District Council	It would be easier to comment if the identification of SO and application of priorities could be shown for each local authority area , preferably mapped or is this the next stage of the Plan?	Due to the level of investigation required over the next couple of years, at this stage we have not broken down plans for each individual overflow. We have published our storm overflows on our website, which outlines our spills as well as confirmed investments. We are creating a version 2 of this map following feedback from customers and stakeholders. This version will include the 2022 dataset and the MP areas and will be released in April 2023. Our approach to storm overflows is updated in the text.	Technical Report - section 5.9
305	CaBA	Water Care Catchment Partnership	Use full local plan for growth. LAs understand the local growth pressures better and are responsible for planning them.	Your concerns are noted. Following all stakeholder feedback we have continued with focussing on a mid point growth scenario for the final DWMP. Whilst planning entirely for a	Technical Report - section 10.1

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
				Local Plan scenario would give us a worst case view, there would be an impact on customer bills and in the current financial climate may risk wasted investment and unnecessarily higher customer bills. As part of our LTDS we will explore the impact of a higher demand scenario through the Ofwat common reference scenarios. More information is provided within the text.	
306	CaBA	Water Care Catchment Partnership	2 degree temperature rise.	Noted.	-
307	CaBA	Water Care Catchment Partnership	Growth will place a huge pressure on drainage systems and it makes sense to remove water "at source" rather than at the cost of changing our drains. It is also a more sustainable approach.	Agree with approach is noted.	-
308	CaBA	Water Care Catchment Partnership	{working in partnership} greater understanding of challenges and possible solutions outside of AW normal thinking. Shared expertise. Some shared finance.	Noted.	-
309	CaBA	Water Care Catchment Partnership	We are concerned that you are underestimating the amount of growth in the S of Cambs	Our approach to understanding future growth is outlined in the text. Our planning team work closely with councils to ensure we capture local differences to the regional plan. If there are any concerns around particular areas of the strategy then we would be keen to discuss further.	Technical Report - section 5.6
310	CaBA	Water Care Catchment Partnership	They {nature based solutions} may not always be possible or appropriate for example some CSOs will need a more immediate remedy, there may not be land available for NBS. A combined approach which takes into account: the location, the frequency of CSO use, the most effective form of reducing flow to a CSO and the cost. The environmental benefits of	We will consider all options and balance off both benefits and timings between the solutions.	-

Reference	Stakeholder type	Consultee	Comments on draft DWMP	Response	DWMP section
			halting CSO discharges will justify any intervention - green or otherwise. NBS should be in a suit of solutions.		
311	CaBA	Water Care Catchment Partnership	The partnership is currently surveying two CSOs - this kind of local knowledge will be invaluable to AW. The partnership host (Cambridgeshire ACRE) is a rural community development specialist and has close links with Cambridgeshire villages.	We're keen to see the results of your survey and look forward to further discussions.	-
312	IDB	Witham Boards	The four Boards have no comments on the documents but will engage in any of the individual projects as appropriate. Also land drainage Consent may be needs for some of the works either direct from the boards if it is in the districts or as agent for Lincolnshire CC within the extended catchments of each of the Boards.	Noted.	-



Anglian Water Services Limited

Lancaster House
Lancaster Way
Ermine Business Park
Huntingdon
Cambridgeshire
PE29 6XU

www.anglianwater.co.uk

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