



South Kesteven Local Plan Regulation 18 Consultation

Anglian Water Response

1. Anglian Water

- 1.1. Anglian Water is the water and water recycling provider for over six million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including coastal flooding. Flooding and flood risk in Lincolnshire may require inland and less vulnerable locations to accommodate additional housing including communities relocated in the future (see NPPF para. 172 (d))
- 1.2. Anglian Water has amended its Articles of Association in 2019 to legally enshrine public interest into the way the business operates for current and future generations. In planning future infrastructure investment Anglian Water will increasingly consider the capital and operational carbon associated with protecting and maintaining infrastructure in less sustainable locations. Anglian Water's Purpose is now to bring environmental and social prosperity to the region we serve.

2. Anglian Water and Local Plans

- 2.1. Anglian Water is the statutory water and sewerage undertaker for the administrative area covered by South Kesteven District Council and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water has engaged proactively with the local plan process to date to ensure the plan delivers benefits for residents, visitors, and business in the area. In doing so our primary aim is to protect the environment and water resources.

3. Commentary on the Draft Local Plan Consultation

- 3.1. Anglian Water welcomes the opportunity to comment on the Local Plan Review – Proposed Housing and Mixed-Use Site Allocations which will take the Plan to 2043, and we have the following comments on the draft Local Plan. The comments are made with reference to the paragraph numbers in the draft Plan.

1. Introduction

- 3.2 Anglian Water (AWS) notes (para. 1.2) that the South Kesteven District Council (SKDC) housing need target increased in December 2024 to 886 homes a year. We note that the May 2025 revision of the housing need target (LHN) increased this further to 894 homes. Anglian Water in planning for likely growth in the region across our fifty-eight local planning authorities (LPA) has assessed



the likelihood that each LPA will be able to deliver the LHN figure by the end of AMP8 (2025-2030) our current five- year investment cycle. Given the 37% increase over current the Local Plan target and that in its peak delivery year SKDC had 914 dwelling completions, AWS has RAG rated SKDC's prospects as 'Amber' to make the step change to deliver 894 homes per year by 2029/30. This rating is part informed by sector commentators views on the constraints in the housing sector including skills and capacity, and in part by local factors, including current headroom at AWS's water recycling centres. We also note that SKDC has a five-year housing land supply (March 2025) of 4.07 years and that in the year to June 2025 some 674 new homes received their first Energy Performance Certificate (EPC).

3.3 AWS welcomes the inclusion (para. 1.14, 1.15 and 1.16) of 'sewerage, water' and 'sustainable drainage systems' (SuDS) in the list of infrastructure required to support sustainable housing growth. AWS will continue to support the evidence base for the emerging Plan including the Infrastructure Delivery Plan (IDP). With the start this year of AWS's AMP8 investment programme of some £39million from 2025 to 2030 in the SKDC area, AWS will be able to provide further updates at ahead of and at Regulation 19 (para 1.19 - January 2026) to the programme for these works to support the Plan allocations and to protect the water environment in South Kesteven.

3.4 AWS will also continue to support the detailed stages of the flood and water sector evidence (para 1.20) in the Strategic Flood Risk Assessment and Water Cycle Study (WCS). Those two evidence pieces will need to be informed by:

- the publication in June 2025 by AWS with the Environment Agency and Natural England of the [SHARED STANDARDS IN WATER EFFICIENCY](#), which seek to supports LPAs in going beyond the 110 litres per person per day standard and
- Anglian Water's plans for two new reservoirs and supporting infrastructure which will come on stream in the late 2030s.

3.5 AWS is planning on the reduction in water use in new homes to enable the continued commitment to supply new and existing residential customers. The water supply deficit in the region and the need to ensure water is available for domestic needs means though for example, AWS has now placed a moratorium on supplying new industrial demands of twenty cubic metres or more per day.

2. Meeting Identified Need

3.6 In AWS's previous submissions to SKDC we have set out that as part of the WCS, SKDC should assess the current WRC capacity and direct growth in the early phases of the Plan to locations which have capacity. This follows the sustainability hierarchy and directions in the NPPF to address climate change through the planning system by reducing the need to build new infrastructure – with its attendant greenhouse gas emissions - when existing capacity is available.

3.7 With reference to housing density (para 2.6), AWS considers that where the WCS shows there is capacity at the WRC which would serve the site then the allocation(s) should look to utilise that capacity and this may be possible through increasing the housing density on site. Site promoters



and developers are encouraged to contact planningliaison@anglianwater.co.uk at the earliest opportunity to seek preapplication advice on available capacity, sustainable points of connection and the use of SuDS as well the use of water efficient fixtures and fittings to reduce water use and the volumes of waste water then requiring treatment. We note that changing housing density on a site may impact on the surface water management options and AWS recommends that climate change is considered for the Plan's SFRA (Part2) and then in detail at the pre-application stage as part of the site-specific Flood Risk Assessment to be submitted with the application. This may for example identify opportunities for the collection of rain, surface or greywater for non- potable uses at development sites.

3.8 Climate change is affecting rainfall patterns, which has a consequence on the availability and quality of water resources. By 2050, more severe droughts, combined with the need for better resilience, will create a deficit of 80 million litres per day in our surface water sources. Groundwater sources will also be affected, however, changes to abstraction licences that restrict access to water resources will benefit the environment. AWS's investment in new sources of water including our strategic pipeline and plans for two new reservoirs (Lincolnshire and Fens) will create greater resilience and help manage water supply and demand – as demonstrated in the WRMP24 (Water Resources Management Plan 2025-2050).

3.9 Climate change is leading to more intense and prolonged periods of rainfall meaning that we also must prepare for flooding impacts, including sea inundation - particularly as 30% of our region is low-lying. We are taking landscape-scale approaches to improve resilience in areas at risk of both drought and flooding. AWS agrees with SKDC (page 19 of the Sustainability Appraisal) that addressing the challenges of climate change will help existing and new communities become more resilient, which will link to the provision of an extended and enhanced multi-functional green and blue infrastructure network to help reduce the risk of flooding and impacts of drought, as more frequent extreme weather events are experienced. Climate change also increases the risks of asset failure, including the movement of underground pipes due to drought saturated ground.

3. Proposed Changes

3.10 AWS notes the removal of four sites (Table 2) and our RAG assessment of those site locations in isolation is set out below.

Settlement	WRC Catchment	DWF capacity at Q80 five-year mean – RAG assessment to serve indicative number of dwellings	AMP8 Investment	DWF at Q90, 2024 flows – RAG assessment for planning applications
Grantham	Marston	Green (TAL)	Storm tank capacity (£2m)	Green (Current planned development)



				uses headroom by 2029/30)
The Deepings	Deepings	Red	None	Green (Current planned development uses headroom by 2029/30)
Harlaxton	Harlaxton	Green	None	Green (After current planned growth limited headroom remains from 2030/31 onwards)

3.11 In summary, should SKDC need to reconsider the sites (three catchments/four sites), AWS would have a preferred order of Harlaxton, then Grantham (subject to a Technically Achievable Limits solution being funded and agreed by Regulators, and lastly The Deepings. If requested, AWS will support SKDC in updating the evidence base; specifically, the WCS, for the sustainability and deliverability of the removed sites as part of finalising and then publishing the Regulation 19 consultation.

- **Water Recycling**

3.12 AWS notes the changes to Site capacity (Table 3), Additional allocations (Table 4) and No Proposed changes (Table 5). The RAG assessment considers the cumulative addition (Table 6) for those settlements/ catchments.

Settlement(s)	WRC Catchment	Net allocations/ Dwellings after 2023/24 completions	DWF capacity at Q80 five-year mean – RAG assessment to serve indicative number of dwellings (a)	AMP8 Investment	DWF at Q90, 2024 flows – RAG assessment for planning applications (May 2025 email to all LPA)
Grantham, Barrowby, Barkston, Gt. Gonerby	Marston	9799	Green (Until 2033)	Storm tank capacity (£2m)	Green

Deepings, Langtoft	Deeping	2118	Red (No headroom. Site specific Policy requiring applicants to confirm wastewater capacity available)	-	Green (No capacity after 2029, WRC growth scheme in 2030s)
Stamford	Stamford	2044	Green (Capacity for all allocations)	Water Quality (£173k)	Green (Work planned on foul network and pumping station)
Bourne, Thurlby, Morton	Bourne	2024	Green (Capacity for all allocations)	Storm overflows (£1.2m)	Green
Corby Glen	Corby Glen	437	Green (Until 2036)	Water Quality (£1.6m)	Green (No capacity after 2030, WRC growth scheme in 2030s)
Colsterworth	Colsterworth	310	Green (Capacity for all allocations)	Environment (£180k)	Green
Ancaster	Ancaster	181	Green (Until 2035)	Water Quality (£1.9m)	Red (Objection based on 2024 flows)
South Witham	South Witham	167	Green (Until 2031. Site specific Policy requiring applicants to confirm	Water Quality (£1.3m)	Red (Objection based on 2024 flows)

			wastewater capacity available)		
Horbling	Billingborough	130	Green (Capacity for all allocations)	-	Green
Harlaxton	Harlaxton	112	Green (Capacity for all allocations)	-	Green
Claypole	Claypole	86	Green (Site specific Policy requiring applicants to confirm wastewater capacity available)	WRC Growth (£3.9m) Network capacity (£1.1m)	Pre Occupation Condition (Growth in Newark of 840 dwellings)
Long Bennington	Long Bennington	50	Green (Capacity for all allocations)	-	Green

(a) Year headroom capacity used, based on a constant build out rate for each settlement 2024-2043.

- 3.13 The Plan does not allocate sites in eight WRC catchments and their settlements which have numerical permits. Six of those WRC have capacity for growth, one (Edenham) has a growth scheme in AMP8 (2025-30) which when completed may support new homes and the remaining WRC (Fulbeck) would be objected to by AWS if an application came forward for new homes seeking to connect to the public sewer network.
- 3.14 Four of the WRC (Great Ponton, Little Bytham and Ropsley) have planned investment in environmental projects totalling some £13.4m in AMP8, including a wetland at Great Ponton.
- 3.15 Sixteen of the AWS WRC in South Kesteven have Descriptive Permits and so would not be appropriate locations for housing growth. AWS welcomes the exclusion of those settlements from Allocations in the Plan.
- 3.16 In addition to the WRC capacity, developments will through pre-application consultation need to demonstrate that there is a sustainable point of connection for the water recycling network which does not overwhelm the network or one in which the developer funds upgrades to the network.



3.17 Overall AWS considers that the identified sites have a good potential to deliver the required housing numbers during the Plan period. Given that we assess the prospect of delivering 894 homes a year by 2029/30 as Amber due principally to supply side constraints including construction sector capacity, the uplift in housing numbers would need to deliver in the second, third and final quarters of the Plan period. In locations with constrained WRC capacity, such as the Deepings, AWS will submit investment Plans to regulators in line with the water sectors mandated five-year investment planning cycle. That investment, if approved, would be undertaken in the 2030s and so we recommend that allocations are phased in line with the capacity identified in the Plan's WCS.

- **Water**

3.18 AWS is required to ensure that there is sufficient water supply to meet the demands of existing domestic customers and to meet the needs of new homes planned over the next 25 years. In 2024 AWS advised the three Local Planning Authorities (LPA) including SKDC that upgrades to the water supply capacity and resilience are required in the water supply zone and distribution network which supplies Stamford. An AWS assessment of the Bourne Water Resource Zone, which includes Stamford has confirmed that sufficient resources are available to meet the increase in demand associated with growth in Stamford prior to the completion of the SPA pipeline. The network investment in AMP8 (2025-2030) to supplement supplies from Northfields Reservoir will enable growth at Stamford North (1350), Quarry Farm (600), St Martins Park (340), Stamford Gardens (200), Uffington Road (100) and Priory Road (43). The upgrades are also being designed to support the Exeter Fields employment site and local centres and services.

3.19 In June 2025, AWS with the Environment Agency and Natural England published [Shared Standards in water-efficiency for Local Plans](#). The guidance supports LPAs which go beyond the current 110 litres per person per day (PCC) standard to higher levels of water efficiency in new homes driving water efficiency down to 80 litres PCC. AWS recommends that the Standards are considered as part of the Water Cycle Study for the Local Plan and supports higher levels of water efficiency in South Kesteven to protect the water environment and biodiversity. Reducing water consumption also assists in maintaining water supplies for future growth ahead of new supplies coming on stream, such as the AWS Lincolnshire Reservoir in the late 2030s.

3.20 AWS advised all LPAs in 2024 that to be able to meet water demands from residential customers and housing growth that AWS may now decline to supply employment sites requiring process water of more than twenty cubic metres per day. That position remains unchanged and AWS requests that the Local Plan includes an advisory to employment site developers to contact AWS at the earliest opportunity to seek to reduce water demands to below this threshold, utilise other supply options including rainwater harvesting and grey water/ effluent reuse for non- potable uses.

Market Towns



Grantham

- 3.21 AWS supports focused growth at scale in principle as opposed to spreading growth around as focused growth is both investment efficient and has carbon economies of scale. The Garden Village together with other planned growth around Grantham is above our nominal threshold of 2,000 homes/ 5,000 people for the top tier of embedded (capital) carbon efficiency in providing new WRC capacity. The total of circa 5,000 new homes at Grantham after the mid-2030s which will require additional WRC capacity once existing headroom is used will enable AWS to consider the design options including expanding the Marston WRC in the next business plan to be agreed by Regulators for funding in or about 2029.
- 3.22 SKDC and potential developers of the 110,000m² of employment uses are advised to contact planningliaison@anglianwater.co.uk at the earliest opportunity for advice on water supply and wastewater options. With reference to part m. (page 18) AWS welcomes the requirement to demonstrate 'wastewater treatment works' (WRC) capacity. For the residential elements of the Garden Village, if it is developed later in the Plan period then the Policy will need a requirement that developers must demonstrate in liaison with AWS and confirmed by the Environment Agency that additional WRC capacity has been provided. If that capacity has not been provided a condition may be required that homes which would result in exceedance of permitted flow limits at the Marston WRC cannot be occupied until that capacity is demonstrably available and would not increase the risk of harm to the water environment.
- 3.23 AWS comments for the Garden Village equally apply to:
- Rectory Farm (Phase 2), including part j. of the policy regarding WRC capacity.
 - Rectory Farm (Phase 3), including part k. of the policy regarding WRC capacity.
 - Prince William of Gloucester Barracks, including part iii. regarding WRC and foul network capacity.
 - East of Sheepwash Lane, which should include a policy on WRC capacity.
 - Grantham Church High School Fields, which should include a policy on WRC capacity.
 - Land north of Gorse Lane, which should include a policy on WRC capacity.
 - Land south of Gorse Lane, which should include a policy on WRC capacity.

Stamford

- 3.24 Cumulatively growth at Stamford including those sites proposed in Rutland can be accommodated at the Stamford WRC (located in Peterborough's administrative area). The progression of sites means that AWS is bring forward schemes to upgrade the foul network and pumping stations serving the catchment. At this time AWS does not consider a policy Requirement is needed for the three Stamford to ensure those works are demonstrably completed, nor is a Requirement currently needed to cover the planned water supply enhancements. The water supply constraints refenced above (3.18) for employment uses



would apply to high water demand industrial/ commercial processes at the Stamford Gateway mixed use site. AWS therefore requests a similar advisory to developers/ applicants to contact planningliaison@anglianwater.co.uk at the earliest opportunity for advice on water supply and wastewater options.

Bourne

- 3.25 The planned residential growth at Bourne, along with allocated sites at Morton and Thurlby in the Bourne WRC catchment will use up the remaining headroom at the Bourne WRC by the end of the Plan period. AWS agrees that there is no current need to include a WRC capacity policy Requirement for the Bourne sites. The hydrology of the area though will require developers to engage early with AWS on the possible sustainable points of connection to the foul network.
- 3.26 AWS recommends that given climate change and annual fluctuations to flows in catchments that the Plan includes a general informative i.e. not one specific to Bourne sites to developers to engage early with AWS. This will in part enable sufficient lead in times for solutions to be identified and brought forward, funded as necessary by developers or by AWS as strategic improvements to the foul network.

Deepings

- 3.27 AWS's assessment of average flows to the Deepings WRC over the past five years indicates that in the medium term, WRC capacity will be a constraint on growth. The one-year flows approach along with consideration of sites currently in construction and likely to connect this year, which is used by AWS's Developer Services team, suggests that if an application were to be determined this year by SKDC, AWS would though not object. As the six sites in Deepings WRC catchment totalling circa 2,100 homes in the Plan come forward it is likely though that the flow capacity will be utilised or the proceeding year's flows will result in an Objection to the application. A best-case scenario is that this may not occur until 2029, although this depends on the progression of sites through the planning system.
- 3.28 AWS recommends that the five Deepings sites and Langtoft site have a site-specific Policy requiring applicants to confirm wastewater capacity available is available. Together with the early engagement advisory (4.6 above), this will enable AWS to seek regulatory approval for investment in this current draft plan period (up to 2029) for works in AMP9 (2030-35) and seek permit approval from the Environment Agency early in the 2030s.

Larger Villages



- 3.29 AWS recognises the social and economic needs for residential growth in larger villages and in the main this can be supported following the sustainability hierarchy which seeks to utilise existing infrastructure capacity first. The RAG table (3.12 above) identifies that growth at five of the villages/ WRC catchments can use existing WRC capacity. New homes at Billingborough, Colsterworth, Corby Glen, Harlaxton and Long Bennington at the scale proposed is therefore a lower carbon/ more sustainable location for growth. Two villages – Ancaster and South Witham – would if applications came forward currently using 2024 flow data, result in an AWS objection to protect the water environment. Growth in Ancaster and South Witham should therefore be phased for later in the Plan period to enable AWS to seek regulator approval to invest in WRC capacity.
- 3.30 Two other villages – Claypole and Edenham – have planned AWS growth schemes for the WRC and so if applications came forward before those schemes were operational (by 2030 at the latest) then a pre-occupation condition would be required to ensure the additional WRC capacity was in place to protect water quality.
- 3.31 Barkston, Barrowby and Great Gonerby are in the Grantham catchment, Baston and Langtoft are in the Deeping WRC catchment and Morton and Thurlby in the Bourne catchment and so are considered above in the respective Market Town comments.

4. Commentary on the Sustainability Appraisal (SA) for the South Kesteven Local Plan Review

- 4.1 AWS supports the approach to the assessment of the proposed allocations set out in paragraph 5.3 and specifically the Habitats Regulation Assessment and its consideration of water quantity, level and flow, and water quality. AWS considers that the approach AWS is now taking to support housing growth in locations at Local Plan and then planning application stage which have environmental capacity takes a similar approach and enables growth in locations which don't currently have WRC capacity to be phased for later in the plan period when investment and permitting approval can be agreed by water sector regulators.
- 4.2 AWS notes the protections applied to public drinking water supplies (paragraph 5.38) and will either through further evidence development – WCS, IWMS, IDP – or through consultation look to inform the Plan on locations where infrastructure to be planned in association with the AWS Lincolnshire Reservoir should be considered by housing and employment site developers. AWS's current view is that none of the proposed allocations directly impact land required for the reservoir's associated or supporting development.



4.3 AWS supports the drainage hierarchy and welcomes the approach (paragraph 5.39) to manage surface and flood water. In advance of the potential enactment of Schedule 3 mandating the use of SuDS, AWS considers that the specific drainage approach to the site allocations is sound.

4.4 AWS considers that paragraphs 5.41 to 5.46 should include consideration of the sustainability hierarchy and the use of existing infrastructure (including water and water recycling) as an assessment criterion for the spatial strategy. This would then assist in reducing the capital (embedded) carbon attendant with housing and employment growth.

██████████, 27 August 2025