

**Danetree Development**  
**Position Statement**  
**Wastewater Infrastructure**

**1. Introduction**

- 1.1 This position statement, prepared in response to a letter from the Environment Agency (EA) to the Programme Officer dated 18 February 2009, outlines the position of the Danetree Consortium (DVC) with regard to the provision of suitable and sufficient wastewater treatment facilities for the proposed Danetree development.
- 1.2 This statement considers issues raised in the EA's proofs of evidence (EA/7 and EA/8) and the Anglian Water Position Statement (19 January 2009 – ANG1)

**2. Discussions with EA and Anglian Water**

- 2.1 On behalf of DVC, Peter Brett Associates (PBA) have participated in discussions with Anglian Water and the EA with regard to the most appropriate provision of wastewater treatment facilities to serve the proposed development.
- 2.2 Those discussions have included attendance at a joint meeting with Anglian Water and the EA in August 2008. At that meeting it was agreed that the most appropriate form of provision would be to upgrade the Whilton Wastewater Treatment Works (WwTW) to cater both for any additional development which may be consented and for any changes in discharge quality which may be required by the regulating authority.
- 2.3 ANG1 outlines the funding process by which Anglian Water is seeking to secure funds for these enhancement works. Although funding is subject to OFWAT approval, given the strategic nature of the development there is no reason to believe that funding for the project will not be secured.
- 2.4 Anglian Water have indicated, (as outlined in EA/7), that the construction process may take around three years from the funding agreement; although it was discussed at the August 2008 meeting that this timescale could be reduced in some circumstances. Subject to the approval of OFWAT, Anglian Water considers funding agreement may be received by the Autumn of 2009(ANG1). Thus a reasonable date for the provision of the additional capacity required at Whilton WwTW may be considered to be late 2012.

**3. The delivery of housing at Danetree**

- 3.1 The evidence submitted to the Inquiry on behalf of DVC demonstrates that, subject to the grant of planning permission by late 2009, Danetree will begin

delivering houses in year 2011/12 (125 dwellings) and in year 2012/13 will deliver a further 225 dwellings.

- 3.2 On the basis of the above projections, between 125 and 350 dwellings may therefore be completed prior to the upgrading of the Whilton WwTW.

#### **4. DVC's position**

- 4.1 Given agreement that the identified upgrade works to Whilton WwTW are required as a final solution to meeting the demands of the development, the issue is not one of principle, but whether and how delivery of the proposed development may be phased in with the delivery of the required infrastructure.

- 4.2 In the event of outline planning permission being granted for the Danetree development, DVC will undertake detailed discussions with Anglian Water with regard to the proposed upgrade works to Whilton WwTW, with a view to reviewing:

- a. Options for shortening the upgrade construction period; and/or
- b. Options for phasing the works to provide the upgrade in line with the completion of development.

- 4.3 In the (we believe unlikely) event of the discussions not achieving sufficient capacity provision within the period between the commencement of occupation of the Danetree development and the completion of the upgrade works then, in association with Anglian Water, DVC will explore the options for an interim solution.

- 4.4 The proposed Danetree development consists of three main catchments, two of which will be pumped to the third where drainage to Whilton WwTW will be by gravity. An interim solution, may, therefore include consideration of the following:

- a. The provision of storage within the system (usually at a pumping station) and tankering to a suitable treatment works. (This is sometimes required anyway due to technical limitations of pumping stations at low flows);
- b. The provision of storage within the system as above, with discharge at agreed rates and times to the existing system;
- c. The provision of temporary package treatment works either at Whilton WwTW or within the development area (to be removed on completion of the upgrade works);
- d. A combination of the above.

- 4.5 Any discussions with Anglian Water in relation to an interim solution would, at appropriate stages, necessarily be undertaken in consultation with the EA.

- 4.6 In this regard EA/8 (para 27) suggests that package treatment works cannot treat sewage effluent to the same standard as larger WwTW but they can perform to required standards. Given the interim nature of any possible requirement to utilise a package treatment works for a limited number of residential units, we believe that such a package treatment works could,

subject to suitable conditions inter alia controlling the number of dwellings that could be occupied prior to the completion of the upgrade works, be provided to meet the water quality outflow requirements of the EA.

## **5. Proposed conditions**

5.1 Based upon our discussions with both Anglian Water and the EA to date, and upon the matters set out above, we believe that the EA's concerns about the impact of the proposed development on the wastewater treatment facilities may appropriately be met by the imposition of suitable planning conditions the effect of which would be:

- to require funding for the upgrade of facilities at Whilton WwTW, or other such facilities to provide sufficient capacity for wastewater treatment as are agreed with Anglian Water and the EA, to be secured prior to the commencement of development; and
- to restrict occupation of dwellings and the discharge of wastewater to such time as either:
  - i. sufficient capacity has been provided at Whilton WwTW or at other such wastewater treatment works as agreed with Anglian Water and the EA;
  - or
  - ii. an interim scheme for the provision of wastewater treatment capacity has been agreed with the EA and has been implemented.

## **6. Conclusion**

6.1. PBA have undertaken discussions with Anglian Water and EA with regard to the most appropriate provision of wastewater treatment facilities to serve the proposed Danetree development.

6.2. As a result of those discussions it is accepted that the most appropriate form of provision would be to upgrade the Whilton Wastewater Treatment Works (WwTW) to cater both for any additional development which may be consented and any changes in discharge quality which may be required by the regulating authority.

6.3. Anglian Water is seeking to secure funds for the upgrade works, and although funding is subject to OFWAT approval, given the strategic nature of the development there is no reason to believe that funding for the project will not be secured.

6.4. It is anticipated that a funding agreement may be received by the Autumn of 2009 and that the upgrade works will take 3 years from the date of that agreement to complete.

6.5. The issue is thus not one of principle, but whether and how delivery of the proposed development may be phased in with the delivery of the required infrastructure.

- 6.6. Subject to planning permission being granted for the Danetree development by late 2009, it is anticipated that house completions in the year 2011/12 will total 125 dwellings and in the year 2012/13 225 dwellings.
- 6.7. On the basis of the above, between 125 and 350 dwellings may be completed prior to the upgrading of the Whilton WwTW.
- 6.8. Following the grant of planning permission DVC will undertake detailed discussions with Anglian Water to review options for shortening the construction period for the upgrade works, and/or options for phasing the works to provide the upgrade in line with the completion of development.
- 6.9. In the (we believe unlikely) event of the discussions not achieving sufficient capacity provision within the period between the commencement of occupation of the Danetree development and the completion of the upgrade works then, in association with Anglian Water, DVC will explore the options for an interim solution, which may include those set out above.
- 6.10. On the basis of all of the above DVC therefore contend that the EA's concerns about the impact of the proposed development on the wastewater treatment facilities may be met by the imposition of suitable planning conditions.
- 6.11. To the extent, however, that this position may not be accepted by the EA, it will of course be necessary for formal evidence to be submitted on behalf of DVC. That evidence is in the course of preparation in anticipation of the EA evidence being given in week 8 of the Inquiry and will therefore be submitted by no later than Tuesday 24<sup>th</sup> February 2009.

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19<sup>th</sup> February 2009