

## Milton Keynes Local Plan Regulation 19 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 inundation by the sea.
- 1.2. The regions which Anglian Water serves have the highest rate of housing growth in England. The 2021 Census reported that population growth in the South East region was 8.3% in the previous decade against a national average of 6.6%. Population growth in the local authority area of Milton Keynes was 15.4%, from 248,800 in 2011 to 287,000 in 2021. This is a significant pace of growth, which is comparable to nearby Bedford growth of 17.7% and Central Bedfordshire at 15.7%. Although growth in Buckinghamshire was lower at 9.5%, the Milton Keynes sub region has the highest rates of growth and largest population and household growth in the Anglian Water region up to 2050. In short, it is already the hotspot for growth in the Anglian region in the coming decade.
- 1.3. The UK government's policy positions on New Towns, growth in connected locations, East West Rail, economic sector growth and specific projects such as Universal will further accelerate growth in Milton Keynes and its hinterland. Based on this policy position Anglian Water is planning for population growth with a scenario averaging 6,900 people per year in Milton Keynes to 2050. This equates to some 3,300 new households per year on average to 2050. Anglian Water's engagement with Government has included providing data on the environmental capacity of Water Recycling Centres across the region to support growth. This approach is based on the sustainability hierarchy which first seeks to use existing infrastructure capacity to enable growth before optimisation and then building new capacity, which have attendant operational and capital carbon as well as land use and potential biodiversity impacts.
- 1.4. Anglian Water has amended its Articles of Association in 2019 to legally enshrine public interest into the way the business is run for current and future generations. Anglian Water's Purpose is now to bring environmental and social prosperity to the region we serve.
- 1.5. In 2024, Anglian Water conducted work to investigate nature recovery projects, and this included a screening exercise for potential river restoration opportunities and a scoping project for hydrological modelling to help us in improving our understanding of the relationship between flow and ecology in our rivers. Looking ahead over the next two years we are investigating the environmental destination for our region, the aim is to identify where, and by how much, water abstraction needs to change to achieve and maintain a healthy water environment, both now and in the future (looking up to 2080). We are working with Water Resources East to deliver the investigations.
- 1.6. Through Anglian Water's joint work with stakeholders - including local authorities, environmental groups, landowners, and community representatives - we will explore and prioritise the environmental outcomes that matter most to our region. This will support our decision making for the type and timing of supply-side options in the next Water Resources Management Plan and Regional Plan. We plan to do this over the next year, Water Resources East will be leading

catchment workshops to gather local knowledge, prioritise waterbodies and identify potential multi-sector solutions to support the achievement of the environmental destination for our region. In the coming months Anglian Water will be publishing a Growth Manifesto as a response to the Cunliffe Review and setting out a detailed programme for investment up to 2030.

- 1.7. Crucially we will be using the published Local Nature Recovery Strategies (LNRS) to support and align our investigations with wider environmental and biodiversity goals, ensuring that water resource planning contributes positively to nature recovery and local priorities. We believe that LNRS can be the missing evidential link in Local Plans to ensure we protect what is most valued and open public access to local nature near development sites to support landscape scale nature recovery. Our rivers and other water bodies will be an essential part in addressing biodiversity decline and climate resilience.

## 2. Anglian Water and Local Plans

- 2.1. Anglian Water is the statutory water and wastewater provider for the Milton Keynes administrative area and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Ongoing significant growth in Milton Keynes means that increasingly water and wastewater network infrastructure is provided by independent companies (referred to as NAVs) by who install and manage these private networks for housing and commercial developers.
- 2.2. Anglian Water has engaged with the local plan process to date including a response to the 2024 Regulation 18 consultation as well inputs to the Council's IDP and IWMS drafts including comments in September 2025. Anglian Water's aim in working with our 58 Local Planning Authorities (LPA) is to ensure development plans can deliver benefits for residents, visitors, and business in the area. In doing so our primary aim is to protect the environment and water resources. We can say that collectively the evidence base which underpins the MK City Plan 2050 is currently an exemplar within the region. As a result, Anglian Water concludes that the draft Local Plan is sound when assessed against the tests set out the NPPF on matters including Strategic policy, developer contributions as well as being positively prepared and effective.
- 2.3. On supporting growth Anglian Water (AWS) has a programme to expand capacity at 80 Water Recycling Centres (WRC) across the region before April 2030. Resolving the impact of environmental pressures; including WRC sites at or near their Technically Achievable Limits (TAL), and so enable future sustainable growth is a matter that AWS will increasingly need to agree permit changes and investment with the Environment Agency (EA) and our 58 Local Planning Authorities (LPA). Milton Keynes growth in the past has been supported by investment by AWS, and the city is in an advantageous position in that there is significant headroom flow capacity at the Cotton Valley WRC which serves the urban city area as well as villages in neighbouring council areas.
- 2.4. AWS is working with the EA on alternative options to accommodate additional growth at WRCs that have TAL targets for phosphorus, and this is particularly urgent in WRC catchments that have existing and likely increases in housing growth and consequent increases in flows to receiving watercourses. Potential solutions being explored include catchment approaches and removing phosphorus from wastewater discharges at upstream WRCs, as well as from other non- water sectors such as agriculture. These solutions will need to be identified by AWS through the next DWMP and PR29 Business Plan to seek investment to support growth without deterioration to water quality. This would be in addition to the £72million of investment plan in Milton Keynes by AWS to 2030 which includes some twenty-four environmental projects across the MKCC area. Three of the projects are being designed to support existing planned growth.

### 3. Commentary on the Draft Local Plan Consultation

- 3.1. AWS has been working with the MKCC officer team and the Council's consultants on the evidence base which supports the Local Plan. We welcome the opportunity to comment on the Milton Keynes City Plan 2050. We have the following comments on the draft 'Plan', and its supporting documents. A separate response on Strategic Flood Risk Assessment (Stage 2) report will be provided to the Council by the AWS Flood Partnership team. We note the intention to submit for Examination an updated draft of the Plan in 2026 to enable its submission before the December 2026 deadline.
- 3.2. One matter which we do not comment on is how the New Town announcement in September 2025 will be considered in the Plan; in part as the approach to delivery will be subject to further announcements by Government in early 2026. AWS welcomes the clarity in the Task Force Report and response that the 21<sup>st</sup> century evolution of new towns for Milton Keynes will be: A 'Renewed Town' in Milton Keynes; reinvigorating the city centre and expanding to the city periphery whilst reshaping the way people travel, by delivering a Mass Rapid Transit system. AWS notes the ongoing work by the New Towns Unit and Homes England to stress-test spending and delivery plans for the 'vital economic and social infrastructure that each new town will require'.
- 3.3. As commented above the New Town announcement of an additional 40,000 homes in Milton Keynes is currently a starting assumption for AWS's future statutory water and wastewater plans which are developed on a five- year cycle. The AWS comments are made with reference to the sections and paragraph numbers in the draft Plan. Adoption of the Local Plan in 2027 – which cover the years to 2050 - would enable its planned housing and infrastructure needs to be fully considered, and investment planned for in AWS's PR29 Business Plan process, which will cover the period 2030 to 2055.

#### Growth

- 3.4 AWS notes that the Milton Keynes City Council (MKCC) housing need target, as of May 2025, is 1,799 homes a year. We further note that in 2024/25 completions fell to 1,440 in the year, ONS recorded housing starts to 970 dwellings, and the draft Plan is currently based on a 2,391 homes per year target to 2050 (Para 7, page 13). Given the 2% increase to achieve May 2025 target (versus the current the Local Plan housing figure of 1,728 dwellings per year) and that in its peak delivery year MKCC had 2,480 dwelling completions, AWS has RAG rated MKCC's prospects as 'Green' to scale up delivery to deliver 1,799 homes per year in 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 policy constraints and economic catalysts such as East West Rail and the Oxford Cambridge Growth Corridor. A key factor that could enable accelerated growth is current headroom at AWS's water recycling centres. In assessing current growth levels, AWS notes that MKCC's existing planned sites provide for 23,000 homes (Para 8, page 13) and the published five-year housing land supply (April 2025) is 10,101 homes - some 5.4 years.

## Part A- General Matters

### Foreword

AWS welcomes that MKCC is recognising and endorsing what 'well-planned growth can achieve' (page 2) and notes that New Towns Taskforce report emphasises the importance of blue -green infrastructure in Milton Keynes and specifically the legacy and ongoing work of the Parks Trust in creating a more liveable and sustainable city.

## **Ambitions and objectives**

1. AWS supports the MK Futures 2050 strategy and its vision including its focus on sustainability and reducing water consumption to below 100 litres per person and to 80 litres in larger strategic developments. Importantly, the Strategy (at page 28) highlights the role of the network of balancing lakes which in the face of climate change and increased risk of surface water flooding could perform a significant function in increasing flood resilience for new and existing communities.

2. AWS supports the Plan's 'Our Ambition', as the importance of growth in supporting prosperity mirrors AWS's own Purpose to bring environmental and social prosperity to the region we serve.

4. MKCC's pledge to tackle climate change and reduce carbon emissions is also paralleled in AWS's projects for the city which include £10.8million for projects at the Cotton Valley WRC to reduce, capture and utilise GHG emissions from the wastewater treatment process. AWS specifically welcomes Objective 4 given our Net Zero by 2030 pledge and targets to reduce operational emissions by 74% and capital carbon by 70% by 2030 (AWS Climate Transition Plan, September 2025). Part of the AWS strategy is to assist Councils in directing growth to locations with existing infrastructure and environmental capacity and so avoid the need to 'pour more concrete' to support housing and jobs growth. AWS therefore supports Objective 6 on the efficient use of resources.

AWS will be able to provide updates for the IDP and Local Plan submission and Examination stages of the Plan as the programme of works for AMP8 (2025-30) is finalised. This accords with the NPPF and PPG positions on the consideration of water sector infrastructure capacity and flood and water management.

### **1. Our growth strategy**

5. AWS notes planned 'significant investment in infrastructure' and whilst AWS's own plans are significant they are not as large as may be required elsewhere in the region on a 'per new property basis', as existing infrastructure capacity can be utilised. This means the MKCC plan is effective and consistent with national policy and frees up developer resources to fund or deliver other infrastructure needs including blue- green infrastructure which will make the growing city more resilient.

6. AWS agrees with the 'infrastructure first' approach and for example AWS now requires that pre-occupation planning conditions are applied to consents for housing where there is currently insufficient strategic sewerage network or WRC capacity and AWS will in AMP8 be investing in additional capacity to ensure there is no material increase in the risk of environmental harm from those additional wastewater flows. AWS supports the proactive approach to minimising carbon emissions through spatial planning and design. AWS agrees that growth at scale in strategic extensions can provide economies of scale including the provision of infrastructure. AWS welcomes the economic growth that MK can deliver in the Oxford Cambridge growth corridor which can be catalysed by East West Rail connectivity.

AWS considers that growth in Central MK is the most effective first option for the spatial distribution of growth as larger scale development in outlier locations in the Cotton Valley WRC catchment, including Newport Pagnell and the north around Deanshanger, would require additional network capacity and reinforcement. AWS agrees that reusing previously developed land and in so doing utilising existing water sector infrastructure can provide a lower cost, lower impact option and this includes reducing GHG from constructing new infrastructure on greenfield sites.

7. AWS notes that the circa sixty thousand homes to 2050 in the draft Plan is below the AWS growth planning scenario which includes more than half of the forty thousand homes proposed for MK under the New Towns programme. AWS will seek to agree growth scenario(s) with MKCC in 2026 which ensure that regulators approve funding and consenting in a timely way to support growth.

9. AWS supports the Plan's growth strategy and spatial approach, and we endorse the Strategic Site Allocations, Strategic City Extensions and Strategic Brownfield Allocations (page 20). AWS has supported the production of the Infrastructure Delivery Plan (IDP). Given the ongoing works to upgrade strategic water supplies to the city and headroom capacity at Cotton Valley WRC, the Plan has some existing front loading of water sector infrastructure which is not in place in many other regional urban centres.

10. The relatively strong water and water recycling position of MK should also be seen in the context of growth in neighbouring council areas, who also have or likely will through Water Cycle Studies (WCS), Integrated Water Management Studies (IWMS) and IDPs identify growth on the borders of MK as a sustainable spatial option. That growth adjacent to MK would utilise the capacity for example at the Cotton Valley WRC more rapidly and may then either require early decisions by adjacent LPA to develop at scale to efficiently provide alternative catchment solutions or to locate growth away from MK to ensure that environmental capacity and the achievement of improved Water Framework Directive designations are not compromised. AWS recognises that cumulative growth in the MK hinterland and/ or accelerated growth through New Towns may provide for and inform a post MK City Plan 2050 examination review of sub regional growth options including water sector infrastructure capacity.

11. Support for the Plan's focus on growth on the existing built up area of the city may mean that future growth on the edges of and outside the LPA area may require large residential developments (subject to EA approval) to include and then construct their own WRC and networks to serve those developments. AWS may elect to take on the long-term ownership and management of those new assets.

12. AWS agrees that concentrated growth particularly in a location which has existing water recycling networks and treatment capacity can reduce the embedded (capital) and operational carbon emissions from new development. As a consequence and coupled with water efficiency and climate/ drainage resilience measures, the Plan could make a substantial contribution to reducing emissions which are attendant to built development.

15. Redevelopment of existing estates and developed areas could with reductions in water use, enable those developments to utilise existing supply and sewerage capacity without requiring reinforcement. The use of re-development wide water management techniques including surface water, rainwater and grey water reuse could further enable higher levels of densification around existing and new transport hubs.

17. The proposed City Extensions can be accommodated through using capacity at the Cotton Valley WRC. The scale of new network growth – whether provided by AWS or a NAV – also has economies of scale which also potentially reduce the embedded (capital) carbon per new home/ resident.

20. Extensions on the periphery of the current Cotton Valley WRC catchment will need to be hydraulically modelled by AWS to inform our next water (WRMP) and wastewater (DWMP) business plans. This work will be progressed in 2026, and AWS would welcome ongoing and early engagement by site promoters on the scale and timing of projects to ensure regulators support planned

investment. Central Bletchley – as an older outlier in the catchment – would also benefit from early site and project specific modelling to ensure any reinforcement works can be undertaken as a programme to reduce disruption and costs.

22. The headroom WRC capacity treatment and network capacity serving Olney means that growth could potentially come forward through a Neighbourhood Plan led approach which utilises existing infrastructure. Capacity at other WRC is more constrained and may over the Plan period be taken up by changes in rainfall patterns and intensity. As such other village Neighbourhood Plans may – with existing infrastructure – be able to support small scale and infill type development. AWS would want to avoid growth in villages in the seven catchments which have descriptive permit WRCs as these have non planned investment to serve growth and that growth may pose a risk to water quality and biodiversity without expensive and carbon intensive (per dwelling) infrastructure provision.

## **2. Our spatial strategy**

23. AWS supports Policy GS1 and considers that it is compliant with national policy, evidence based and enables positive planned growth which can be effectively delivered including through joint work with adjacent LPAs.

24. AWS supports Policy GS2 and considers that the spatial strategy is sound and flexible.

26. Recognising that ‘most jobs in Milton Keynes city are service sector jobs’, means that employment growth in MK is not as constrained by water supplies for non- domestic uses and potential trade effluent flows. With the exception of data centres (paragraph 26) – which potentially could re- use wastewater from WRC or look to utilise non potable water from the MK Balancing Lakes – this service sector growth should not be limited by the twenty cubic metre moratorium that AWS has needed to bring in elsewhere in the region for new and expanded non-domestic water demands. The water intensive uses such as they are in MK may well be able to utilise rainwater harvesting, balancing lake or groundwater flooding abstraction freedoms to provide additional supplies. Where this isn’t feasible then new overnight, seasonal or drought responsive tariffs could be brought in to smooth out peaks of new demand.

29. In supporting EWR, AWS recognises that MK has the potential through increased physical and digital connectivity to be a spin off location for life sciences and other research led sector’s which are unable to or prefer due to housing availability to locate away from Oxford and Cambridge.

42. AWS considers that Policy GS3 is sound in that the evidence supports the continued growth of sectors which MK has strengths in, and those sectors are not high- volume water users or trade effluent producers. Policy GS3 is therefore effective and deliverable, in that it is not significantly constrained by water regulatory decisions on investment or permits. Ongoing and planned strategic water supply upgrades to support housing growth – with increases in water efficiency - will therefore support jobs growth alongside new homes.

47. AWS supports the Plan in identifying the importance of green and blue spaces for well- being including enabling connections to nature. AWS considers that implementation of the LNRS and its translation into design through the Plan should support the key planned successful aspect of the existing MK new town, namely its green and blue spaces. The role of open water and aquatic habitats is an important quality of life and resilience feature in MK’s development, and this includes the network of ponds, swales and ditches which have been created at scale in larger development.

52. AWS supports Policy GS4 and consider that the preceding paragraphs make the link to blue infrastructure as part of the 'Open Space' requirement in Table 5 parts 3, 4 and 5 of policy GS5 including climate and health resilience.

69. AWS considers that Policy GS6 Open Countryside is evidence based and complies with national policy, and it is effective as the policy provides for the enhancement of green and blue infrastructure. This may be the enhancement of surface drainage to address climate change and so prevent surface water being directed to or ingress into the sewer network or it could be the remodelling or utilisation of the Balancing Lakes to increase flood resilience or provide alternative water supplies.

74. AWS welcomes Policy GS7 as this would support the further deployment of renewables at AWS sites to enable AWS to achieve Net Zero by 2030. The policy is sound as it complies with national policy including supporting the energy resilience of essential infrastructure such as water supply pumping stations.

88. AWS supports Policy GS10 and specifically part G on the Bedford to Milton Keynes Waterway Park safeguarding which provides the opportunity for consideration of water transfer as was canal-based connectivity.

91. We recognise the increasingly important role, which water and water recycling are playing in deciding the location and pace of growth across the AWS region. As identified above cross border and development adjacent to MK will bring forward the need for further water and water recycling investment in MK or require those developers to provide solutions which husband the infrastructure and environmental capacity with the area of the Plan. AWS considers that the Plan IDP is currently an exemplar for LPA and plan making and so we would recommend that in taking forward Policy GS11 n cross-boundary growth that other LPA's mirror as closely as possible the methodology and presentation of the Plan's IDP.

Specifically on part 4 of Policy GS11, AWS recommends that an updated Integrated Water Management Study includes consideration of the water resource management, including flood controls, drainage, water supply and sewage network and treatment capacity and the additional resilience and consequent support for growth that the uses of the Balancing Lakes could have in reducing from surface water and ground water infiltration into the sewer network.

92. On the Plan's strategic allocations for growth AWS currently does not have any strategic capacity reasons why these greenfield and brownfield sites could not be brought forward over the lifetime of the Plan. The growth in the Plan will inform AWS's own investment Plans and so the decisions of regulators on investment and environmental controls. We have set out above why the sites – and so the Plan - collectively provide a sound and sustainable spatial and housing needs delivery option. Therefore, AWS does not see the need to explicitly mention in Policies GS12 to GS15, for example, the need for early engagement with AWS to ensure adequate water and water recycling capacity is available.

111. AWS supports the blue infrastructure requirements in the site-specific policies such as GS17 and GS18 which will provide for development scale SuDS design which considers climate change allowances. The Balancing Lakes study recommended above will inform this design and the role that Caldecotte Lake in that instance can play in blue infrastructure access, flood prevention, resilience and potentially in non- potable water supply.

114. For Policy GS23 and the South Caldecotte strategic employment allocation, the future Balancing Lakes study again provides the opportunity to consider water management options and specifically the role of the new linked open space area and balancing ponds to future proof the flood role of the lake and potentially provide non potable water for commercial uses.

### **3. Infrastructure first**

115. The past forward planning and scale of growth of MK has enabled AWS to ensure that water and water recycling infrastructure is delivered ahead of development and site-specific networks and connections supported as sites build out. Over the next five years AWS considers that existing, ongoing and planned infrastructure investment will continue to support growth at the planned pace.

124. Depending on the outcome of AWS's challenge to regulators and the detailed approach being developed by government following the Cunliffe Review, it is possible that new water sector infrastructure may after 2030 need to be funded directly by developers. At this point in time AWS considers the Plan is deliverable and so the funding model for Flood Risk and Water Management (Table 9) – and part F of Policy INF1 - will need to be reviewed under the next MKCC Local Plan (or Spatial Development Strategy).

### **4. Central Milton Keynes**

158. AWS would welcome the inclusion of blue infrastructure in the design code and specially the role of SuDS and permeable surfaces in all CMK areas as well as multi- functional public space (Policy CMK2, part E.3.a.) in urban areas to manage intense rainfall events.

### **5. Central Bletchley**

181. AWS is supporting East West Rail in principle as catalyst for connectivity and region social and environmental prosperity. Growth and redevelopment at Bletchley and sustainable transport links to Oxford and Cambridge therefore assist in utilising existing infrastructure capacity and assets which accords with the sustainability hierarchy on minimising resources used to support projects and development.

### **6. People Friendly and Healthy Places**

AWS welcomes the use of the photos showing recreational activities on Willen Lake as the levels of the lake as one of the two 'managed' Balancing Lakes where AWS control the water levels.

202. AWS agrees with the Milton Keynes Healthy Place Principles (Figure 11) and specifically Access to open spaces and nature – including blue infrastructure, Access to healthy food – and water, Minimising the use of resources - including using existing assets first and Address & mitigate Climate Change impacts – including designing places to be ready to manage weather extremes through reducing flood risk and consuming less water in homes and businesses.

216. AWS supports the use of design codes for large scale developments to drive up climate change resilience and reduce the use of resources including water consumption and wastewater volumes needing transport and treatment.

243. AWS considers that Table 10 or Policy PFHP9 should include access to and the multifunctional role of blue infrastructure amenity which provides health, flood resilience and cooling benefits for buildings and communities.

### **7. High Quality Homes**

248. AWS considers that the flexibility or homes to adapt should not be at the risk that high levels of water efficiency and the reduction of wastewater requiring treatment is not delivered in the new homes to be built in MK in the next few years. This should equally apply to affordable housing and other forms of social housing where the reduction in water use can save residents money and reduce bills for heating water.

## **8. Climate and Environmental Action**

284. AWS is working with the EA to improve water quality and has a £65million programme of investment in water recycling in Milton Keynes over the next five years including seven schemes to significantly reduce the levels of phosphate being discharged into receiving water courses. These AWS schemes coupled with farmers reducing fertiliser and chemical treatment of fields near streams and rivers and designs roads and urban areas not to transport polluted surface water runoff to water bodies can collectively improve water quality and water-based biodiversity in MK over the coming decades.

286. AWS through our work on reducing operational and capital carbon considers that growth in large developments in MK; as opposed to small scale piecemeal growth or in locations which require new water sector infrastructure, is the most sustainable low carbon option for new homes and employment growth in the MK sub region. The reduction in the use of water and the volumes of wastewater help to husband existing capacity and reduce operational emissions from treatment and pumping. Similarly low carbon nature-based solutions, such as SuDS both offer reductions in emissions from not putting in traditional grey infrastructure and provide carbon sequestration opportunities.

288. AWS supports the whole-life carbon approach including putting in place low carbon fixtures and fittings at construction stage rather than carbon intensive retrofitting.

292. AWS supports Policy CEA1 Sustainable buildings and considers that it complies with national policy and is positively and effectively drafted to assist developers in reducing the attendant carbon emissions from development.

294. AWS would also note that in addition to the potential embodied carbon in structures to support green roofs they may also require a water supply. AWS would support that water supply being taken from rainwater or greywater harvesting (as listed in Policy CEA2) where then whole-life carbon balance of that solution positively contributes to MK's carbon negative objective.

299. AWS supports the water efficiency elements of Policy CEA4.

300. AWS welcomes the importance that MKCC and the Plan puts on improving water efficiency. The adoption of the 85litres and 100litres standard are the primary measure by which AWS through our work with LPAs will deliver the demand management approach in the AWS WRMP. 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. 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 which is now applied in the vast majority of the Local Plans in the AWS region. The Shared Standards also seek to d maximise water efficiency in commercial developments.

AWS supports and endorses Policy CEA5 Water Efficiency and the approach to implementation through applicant certification for residential development and BREEAM accreditation. The Plan policy is effective and evidence based. AWS is now reviewing whether as part of AWS process for assessing non 2008 Planning Act applications, a Water Resources Plan should accompany those requests. The use of Water Resource Plans by MKCC and other LPAs to consider standard non-residential planning TCPA applications and so enable consultation of AWS and the EA on the impact of the proposed water-intensive development would enable a consistent approach as part of the environmental assessment of those proposals.

AWS endorses part C. of Policy CEA5 as these measures are drawn in part from the Enabling Water Smart Communities (EWSC) project. The EWSC project which AWS is a lead partner is developing approaches and evidence to underpin changes in how developers, communities and residents value water and so seek to reduce water use. This includes work on the viability of measures and the whole life carbon benefits of interventions. These measures as part of the demand management approach will help bridge the gap from reductions in abstraction to when AWS's plans for two new reservoirs and supporting infrastructure which will come on stream in the late 2030s.

As part of AWS's ongoing support for the Plan and Policy CEA5, we will provide updates on the outputs from the EWSC project including the costs of development scale water re-use for residential development, water re-use projects utilising grey water or final effluent for non- potable uses in industry and the updated water supply position from early work on the new (2030 to 2055) WRMP.

302. AWS supports Policy CEA6 Low and zero carbon energy provision as part of AWS pathway to new zero is to utilise emissions from water recycling processes to generate energy and to maximise solar and now wind energy generation opportunities at AWS sites.

307. AWS welcomes Policy CEA7 and specifically parts A. and B. seeking to protect groundwater, part C. recognising the various pathways for water pollution and part G. on the cordon sanitaire development buffers around WRC sites. On part M. of Policy CEA7, AWS recognises that whilst reducing phosphorous in treated water discharges would see an improvement in water quality and water body status, the scale of development and other non-WRC sources of phosphorus may counter that likely improvement from AWS investment. Over the course of the Plan the objective, and the driver behind part M. must be to see a material improvement in the status of water bodies in MK, as defined under the Water Framework Directive. This will be a decades long programme to improve the ecological quality of water bodies which in turn supports nature recovery and improves public health.

308. AWS supports policy CEA8 and the role which blue infrastructure has in improving people's quality of life. The next steps in the implementation of the LNRS and the Milton Keynes Nature, Green and Blue Infrastructure (NGBI) Strategy can assist in identifying and linking these blue zone assets and the catchment scale network including the role of natural flood management. This may include developer contributions to deliver the reduction of flood risk to existing communities. This should include flood risks which have increased due to climate change and climate resilience measures in and to support new built development.

323. AWS supports policy CEA10 and specifically the landscape scale recovery of nature in the catchments based upon the Milton Keynes Nature, Green and Blue Infrastructure (NGBI) Strategy.

342. AWS has above set out our recommendation that a study of the Balancing Lakes future flood and water management role is undertaken by MKCC as LPA and the LLFA.

343. AWS's Flood Partnership team's comments on the SFRA are being provided separately.

344. AWS welcomes the signposting of applicants to AWS and is increasing the resource available to planning applicants for advice on SuDS. AWS is though not a statutory consultee on planning applications and consequently MKCC as the LPA may decide to place more weight on the views of statutory consultees such as the EA on flood matters.

345. AWS is now advising applicants in pre-application advice whether a sustainable point of connection to the foul sewer network is possible and where in some instances an area or a whole WRC catchment no longer has capacity to provide a new connection without materially increasing the risk of pollution from domestic wastewater or trade effluent. MK though is fortunate that none of the planned locations for development have currently been flagged as being without a sustainable point of connection.

347. AWS endorses Policy CEA13 on SuDS and integrated flood risk and water management subject. It is for MKCC to consider whether a more robust evidential position would support the Plan at Examination and in the baseline for planning applications through FRA (part A of Policy CEA13) and their consideration by MKCC as LPA, if a Balancing Lakes study supported the SFRA.

AWS endorses part B of policy CEA13 as this will enable developers to work with AWS to demonstrate capacity exists and/ or will be brought forward through AWS and/ or developer funding. The safeguarding and protection of water sector infrastructure limits the risk of leaks and ensures that underground assets can either be designed around or as a last resort diverted. As development is brought forward in pre-application discussions with AWS, we can advise applicants where local reinforcement of networks is required and these works can be designed into development projects.

AWS welcomes Policy CEA14 and its recognition that other forms of development and land use should seek to protect the water quality and flood resilience of water bodies in MK.

AWS supports Policy CEA15 and specifically part A. on flood protection assets and part C. and G. on FRA and part D. which supports a 'betterment' approach and so looks to project existing communities.

## **9. Economic and Cultural Prosperity**

348. With reference to comments above on moratorium on supplying significant new or increased potable demands, AWS is required to ensure that water supplies are available for domestic purposes including at cultural venues. AWS is also required to ensure supplies are available for firefighting. AWS in working with nationally significant infrastructure projects, including East West Rail, in reducing the need for or scale of potable water connections by supporting the use of rainwater harvesting and/or development scale surface water storage for dust suppression during construction and fire- fighting needs when a project becomes operational.

## **10. Heritage**

387. AWS agrees with the need in Policy HE1 to balance consideration of non-designated local heritage assets with the need for development and the options available to avoid on minimis impacts. The balancing exercise is particularly important at operational utility sites which need to be upgraded to support existing communities or protect the environment and/ or provide essential infrastructure to enable growth.

## **Annex A: Housing Trajectory**

AWS notes the planned trajectory, and we have above commented on AWS's current approach to growth which sees Milton Keynes increasing delivery as the indicative 40,000 new homes from the Government New Town programme is added to the Plan numbers. AWS will in 2026 be seeking to agree growth scenarios with all LPAs as a basis for developing the next WRMP and DWMP and the Investment and Business Plans which will be submitted to regulators to support growth from 2030 onwards.

#### **Annex E: Infrastructure Prioritisation Framework**

AWS concurs with the categorisation of water including water efficiency and wastewater as essential. As commented above, except for non-domestic water demands, MK is in a relatively fortunate position on water supply, sustainable points of connection and WRC capacity. On going work with the EA on reviewing WRC permits for example at Cotton Valley WRC may mean that until improvement works on projects such as storm tank capacity is completed and new permits issued that AWS would support the EA in seeking pre-occupation conditions. This is currently only the case at one WRC site, Hanslope, due to 2024 dry weather flows. As long-term flows over the past five years do not give a cause for concern and 2025 flows may result in the Hanslope pre-occupation condition requirement being removed.

On Flooding Risk Management AWS considers that their Category B designation i.e. mitigation from early occupation - using site and local area specific FRA, for example, is necessary as a minimum to ensure compliance with national policy. provided

#### **Annex F: Infrastructure Planning Benchmarks – Flood Risk and Water Management**

AWS welcomes the alternative calculation of water efficiency benchmarks as a per dwelling metric. The Water Recycling metric applies an infiltration rate i.e. ingress into sewers. For the purposes of a per household or per person metric AWS uses the conversation rate that 90% of water demand in the home will then be directed from that home to the sewer network. Consequently, a reduction in the volume of water used will also reduce the volume of wastewater entering the sewer and then needing treatment and eventual discharge as final effluent. This therefore husbands sewer, treatment and environmental capacity to support additional housing and/ or employment.

AWS welcomes the reference to the Shared Standards and we recognise that as one of the first LPAs to take this forward Annex Fat Regulation 19 and then to Examination, further evidence will be required from Natural England on the biodiversity benefits, the EA on water quality and AWS on matters such as monitoring and support for developers. On monitoring the roll of smart meters to existing properties as well as the near universal installation in new homes will enable AWS to provide annual updates to inform LPA's AMRs and as a consequence to agree any joint intervention measures with LPA's and the EA on a geographic, developer or site-specific basis. This will support the deliverability and effectiveness of the policy and so complete the soundness requirements of the improved policy approach.

#### **Annex H: Policy standards**

AWS supports the use of the Urban Greening Factor to assess green (and blue) infrastructure design in developments.

#### **The Monitoring Framework**

AWS notes that the first step in assessing delivery of Policy CEA5 on water efficiency is how many applications (residential and non-residential) are designed to achieve the standards and that the objective will once the plan is submitted for Examination and has 'some weight' in considering applications the intention will be increase compliance to as near 100% of applications at decision stage achieving the standard. We have set out above how AWS's own monitoring of water demand in new developments as well as established homes and businesses could each year inform MKCC's AMR and so inform improvements to or the further embedding of the water efficiency/ demand management approach.

#### 4. Comments on supporting documents

##### **Proposed Policies Maps**

AWS has reviewed the Maps and proposed sites and has no additional comments on matters of soundness to those set out above. Sensibly the Cotton Valley WRC is carved out of Policy CEA8 and CEA10 areas given its importance serving existing and planned development. The policy map also shows that the operational areas and areas where new or reconfigured infrastructure may be required to meet improving environmental standards are outside Flood Zones 2 and 3. In bringing forward developments on sites such as the Milton Keynes East Strategic Urban Extension, developers will be advised of the need to either protect or divert existing underground water and water recycling assets. In the MKE SUE there are limited existing water supply and mains pipelines, and these are mainly within the existing road and highway verge and so can be accommodated through applying Part B of Policy CEA13. Looking at the sewerage network there are no overriding issues with sites and how they can protect or divert existing underground assets, such as the rising main which cross from south of Newport Pagnell, under the M1 and runs to the Cotton Valley WRC.

AWS considers that application of Part G of Policy CEA7 will mean that a part of the MKE SUE would not at first instance be a suitable location for residential development. However, as this part of the SUE is adjacent to the M1, the masterplans for the development could locate less sensitive land uses in this buffer area.

##### **Sustainability Appraisal (Regulation 18)**

AWS agrees with the importance assigned to water supply, water recycling and water quality in the Sustainability Appraisal (SA). The links to other objectives of the water sector including climate change, biodiversity, health and waste are evident and have been used to support a comprehensive and joined up policy approach in the draft Plan. AWS particularly notes that (paragraph 2.56) that MK through the Plan has a wider role to play in delivering environmental gains. For example, by reducing water use in new homes and businesses MK frees up limited water supplies to support employment growth elsewhere in the AWS region as well as nationally important projects in the energy and transport sectors.

AWS appreciates the foresight that the MKCC officers and Councillors have in recognising the important role that the Plan and planning decision have in improving water quality (paragraph 2.57). Again, it is noted that MKCC recognise that water quality - which by its nature is a catchment and river-based issue – requires action by all within that catchment to ensure that our rivers and water bodies do not deteriorate as growth increases the volumes of final effluent and run off from urban areas.

AWS considers that the Regulation 18 SA assessment of growth scenarios and alternatives is sound and so supports the selection of the proposed allocations in the Plan. AWS notes that the SA sets out possible higher 'Estimated Max Capacity' numbers for several of the site options. AWS supports the conclusion that Reasonable Alternative 1 best aligns with the Plans objectives and so performs best against the SA criteria. We agree that growth of the scale planned in the east of MK offers the best opportunity to implement water efficiency measures at scale, to utilise SuDS to reduce flooding and eliminate the need for surface water to be directed to the sewer network and to install a new network which minimises both costs and carbon and can be connected to the Cotton Valley WRC.

### **Sustainability Appraisal (Regulation 19)**

AWS agrees with the Regulation 19 SA conclusions that Scenario 5, should be the Preferred Option and concurs with the view that its accessibility and transport benefits offer climate change and land use gains. We note that the assessment against Water objectives (section 6.14) does not seek to differentiate between the six growth scenarios. AWS notes (section 6.14.1) that the EA does not flag wastewater/ WRC capacity issues and so rightly turns to mitigation measures which alongside growth protect or improve water quality and the WFD status.

On water efficiency AWS notes that the SA reiterates that new homes must achieve a minimum standard of 93 litres per person per day set out in part A. of Policy CEA5. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term regional water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy.

We agree that the higher standard of 85 litres is both viable and achievable on larger development and 100 litres per day on smaller developments as set out in paragraph 300 of the Plan. The policy and its summary in the SA (9.14.1) are considered by AWS to be a first step in moving from the 110litres position and so enables a fixtures and fittings approach alongside the use of development scale measures such as rainwater and greywater harvesting to demonstrate that higher levels of water efficiency are achievable. Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible (suggests a range between 85-95 l/p/d subject to viability and feasibility). The scale of growth in MK also means that the measures required to deliver water efficiency gains will have lower capital and carbon costs. AWS would therefore support early review of Policy CEA5 to consider whether a move towards the 85-l/p/d standard can be sought on all but small scale (10 dwellings or less) developments.

AWS agrees with the monitoring steps (Section11) and specifically that data on water supply and wastewater treatment should be collated for the Plan – for updates at the Examination – and to inform future local plan-making. On water efficiency the collation of data from smart metering will enable confirmation that the differential approach to small and larger sites is delivering the environmental gains or requires policy corrections.

### **Duty to Cooperate Statement**

With reference to regional water supply constraints and potential housing development on the borders of MK which may utilise water recycling capacity that mainly serves MK, AW welcomes the engagement by MKCC with adjacent LPAs. AWS considers that a shared approach to water demand management and to planning the sustainable utilisation of infrastructure capacity should underpin the selection of site allocations, their phasing and the delivery of supporting infrastructure. We note

that some of the adjacent LPA place a higher need on ongoing engagement with MKCC on water management as a Strategic issue than other Councils.

### **Infrastructure Delivery Plan (IDP)**

AWS considers that the IDP methodology is sound and the approach is one we recommend other LPA follow as it effectively and coherently considers the spatial, extra authority, temporal, deliverability and interdependency aspects of infrastructure.

AWS agrees with the summary (Table 28) of the operator role that AWS has in managing the strategic network of balancing lakes. This operator role is unique to MK as elsewhere these functions are undertaken by the local authority or other land/ water body/ riparian owners or the EA.

AWS agrees that the majority of planned growth would be served by wastewater capacity at the Cotton Valley WRC (Table 40). AWS will assess the need for developer contributions towards strategic enhancement of the sewer network as sites are brought forward. There is no current known reason why sites in the Plan could not be connected to the sewer network and served by the WRC in that catchment. AWS is currently progressing options with the EA on increasing the overall capacity and resilience of the Cotton Valley WRC (Table 40). These are being designed to optimise the operation of the WRC and reduce the risk of spills particular because of storms. Elsewhere in the region AWS is starting to roll out through joint ventures projects to reuse final effluent to service specific industrial or energy sector needs. If a business were to come forward seeking a significant non potable supply in MK, then this would need to be near Cotton Valley WRC to reduce the costs and impacts from piped connections (Table 40). AWS has not been approached for a non- potable demand in MK and so it is not considered necessary to seek to plan for this in the MK Plan.

The WRC summary position (pages 194 and 218) remains unchanged and would be updated in April 2026 when 2025 flow data is validated by the EA.

### **Growth and Infrastructure Topic Paper**

No comments.

### **Integrated Water Management Study (IWMS) Phase 2 Final Report**

AWS has made significant contributions to the IWMS over the past 28months including providing comments on draft documents.

As set out above the AWS is planning in its new WRMP and DWMP for growth that is over and above that in the Plan (page xiv and Figure 4.5). AWS will in 2026 seek to agree scenarios for modelling and then testing against for investment options for the emerging plans which will look to investment in 2030 to 2035 and plan for a long-term position in 2055. We welcome inclusion in the IWMS (page 7) to AWS's reference to the Cunliffe Review and in 2026 we anticipate that there may be changes to the regulatory approach to the water sector which will likely require an in AMP (i.e. before 2030) revision of investment plans for 2026 to 2030.

4.3.5 AWS is currently reviewing the 20,000 litres per day moratorium on new non- domestic users. In part this is possible as some existing non- domestic customers are reducing demands through greater water efficiency although this has partly been offset by onshoring of production.

4.3.7 AWS supports the IWMS references to cost savings for domestic water users from increased water efficiency. One of the main drivers of this is reducing the quantity of hot water that new homes

use, through having more efficient showers and other fixtures and fittings. This then saves on energy bills as well as water bills.

Tables 4-2 and 5.6. AWS will be engaging with all LPAs in 2026 on water and wastewater performance as part of the WRMP and DWMP process. This will start in February or March 2026 with workshops on growth scenarios. AWS considers that the AWS annual review process and LPA engagement will improve the monitoring and effectiveness of Local Plans and support reporting on metrics including existing and new home water use.

5.1. The Ampthill strategic supply pipeline upgrade including the Ridgmont Pumping Station project (in Central Beds) remains on track for delivery. AWS is reviewing the design options following EWR providing updated information on Ridgmont Station enhancements.

Tables 5.3, 5.4 and 5.5. There are no material changes to the WRC capacity and position to support growth. As stated above should growth come forward in Hanslope early in the plan period a pre-occupation condition would be sought. The other point to re-iterate is that AWS would not support growth at the seven Descriptive Permit WRC sites in MK as this would pose a real but unknown risk of pollution.

6.2.2 AWS recommends that flow data for five years is used to assess the mean Q80 dry weather flow position for WRCs.

7.7 and Table 82. AWS notes that the Balancing Lakes are not considered in the IWMS.

### Conclusion

AWS considers that the Plan, policies and evidence supporting them are sound and provide an evidence based and rational development plan to positively deliver against MKCC's and current national policy and objectives. We recognise that the planning policy landscape is shifting with the New Towns proposals looking to accelerate growth in Milton Keynes and updates to national policy promoting higher levels of growth in the most sustainable locations.

AWS believes that the Plan as drafted has sufficient flexibility to provide the opportunity to increase housing and employment growth over and above the levels set out in the Plan. Higher levels of growth at the end of the decade and into the 2030s and the introduction of new sites for delivery in the 2040s, would require significant new water and wastewater infrastructure. AWS's next WRMP and DWMP - to be signed off by regulators in 2029 - will plan for that higher policy driven level of growth up to 2055. These AWS investment plans can then inform the next MKCC Local Plan and/ or Spatial Development Strategy.