

## Water Recycling Centres with Descriptive Permits

### Anglian Water Position Statement

#### March 2025

#### Background:

Descriptive permits apply to small water recycling centres (WRCs), often referred to as Descriptive Works. They serve a small number of properties within an existing settlement (predominantly served by private wastewater treatment measures - e.g. septic tanks) or small settlements. Descriptive permits are for a low-risk discharge which does not contain any numerical limit conditions (other than volume) for the discharge, but relies on descriptive conditions only – meaning there is generally no requirement for flow measurement at these sites. A descriptive permit means no trade effluent is accepted at the works, and no potable water supply intakes downstream are likely to be adversely affected. The Environment Agency (EA) will also assess whether there is any significant environmental or amenity impact before they grant a descriptive permit. There are descriptive permits for over 300 WRCs within the Anglian Water region.

Compliance with a descriptive permit is based on a regular visual inspection by the Environment Agency. The site inspection will assess the operation and maintenance of the works and any environmental impact that the works is having. Anglian Water undertakes routine site visits to these WRCs and will carry out maintenance at descriptive works when required.

#### Growth risks:

As a result of the limited, and sometimes very constrained, parameters for descriptive permits, there is a risk that incremental housing growth within or close to the WRC catchment could exceed the capacity of these small WRCs and potentially cause environmental harm. This growth could arise through a number of different pathways including housing targets in Local Plans, site allocations in Local/Neighbourhood Plans, windfall development, and speculative applications.

Currently, Anglian Water is not a statutory consultee for planning applications, and therefore, we seek to provide consultation responses on mainly major applications at present. Therefore, a settlement with a descriptive works could have incremental growth through windfall/minor developments (9 or fewer dwellings) which could potentially exceed the capacity of our small WRCs that were not designed to accommodate these levels of growth.

#### Anglian Water Position:

Our position is that locations with descriptive works are unsustainable for any form of growth that requires a connection to our network, unless proposals are supported by flow data for a one-year period to demonstrate there is headroom available to accommodate the proposed growth. Alternatively, development may be served by alternative/private wastewater treatment facilities such as package treatment plants and subject to the general binding rules or required discharge permit from the EA.

## Responses to Local Plans and Neighbourhood Plan consultations:

In the settlement hierarchy/spatial strategy for Local or Neighbourhood Plans, these locations will be RAG assessed as RED – no capacity for growth and no investment proposed - unless investment for increasing capacity has been identified in our Business Plan and informed by the Drainage and Wastewater Management Plan. This investment in capacity would generally mean a move to a numeric permit with built-in flowmeters. We would still need at least one year of flow data to assess whether headroom exists for further growth.

Our response to any proposed growth that requires a connection to our network in the catchments of descriptive works in local or neighbourhood plans would be:

*This settlement is served by a small water recycling centre that has a descriptive permit. These works are not designed to accommodate additional wastewater flows that would arise through the level of growth proposed by the plan, which has the potential to cause environmental harm. Anglian Water recommends that:*

- 1. The spatial strategy excludes the settlement for growth where the assumption is that new development would connect to our network; OR*
- 2. If very small-scale growth to meet local needs through infill development is proposed to connect to our network a policy measure must require the developer to demonstrate that there is headroom to accommodate the flow (based on the developer monitoring flows for one year).*

Anglian Water will not object to growth in these locations where the position is clear that development is not dependent on a foul drainage connection to our descriptive works.

## Responses to Planning Application Consultations

We will object to planning applications for dwellings in locations served by a WRC with a descriptive permit, stating there is no capacity for growth. We will only remove our objection if the developer chooses to engage with Anglian Water and monitors flows to the WRC for a minimum of 12 months to determine whether flows can be accommodated at the works.

Where a growth capacity scheme has been identified in the Business Plan and the WRC moves from a descriptive permit to a numeric permit, there would need to be a full calendar year of verified flow data before Anglian Water would be able to assess whether headroom exists to accommodate growth.

## Small Sewage Discharges (SSDs)

SSDs are defined as WRCs which either discharge no more than 5m<sup>3</sup>/day of effluent to watercourse (roughly equivalent to the daily flow from 8 houses), or 2m<sup>3</sup>/day if they discharge to a soakaway. The EA have decided that these types of discharges no longer need to have an Environmental Permit. Instead, they are bound by a series of 'General Binding Rules'<sup>1</sup>. Anglian Water still undertakes site visits and maintenance of these sites as if they were descriptive works. However, as a result of the very limited capacity of these dischargers, there are no permits for these WRCs and no capacity for additional connections. Anglian Water would therefore object to growth (Local/Neighbourhood Plans and planning applications) in locations where a connection is proposed to these SSDs, and alternative wastewater treatment facilities would need to be considered.

## Conclusion

The Drainage and Wastewater Management Plan assessment process will continue to review any small-scale incremental growth and compliance risks that would subsequently need to be addressed through our business plan investments. This position statement will help to ensure our environment and water quality is protected. Anglian Water recognises the challenges local planning authorities are facing with resources in planning departments and the complexities of changing policy landscapes. We seek to provide a clear policy position on these descriptive works and SSDs that will help in the decision-making process and policy preparation. If you require any specific advice, see our contact email below:

### Local / Neighbourhood Plans:

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### Planning Applications:

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