

Verna Masters

From: Matthew Humphrey
Sent: 02 March 2023 14:00
To: Abbas Amin; Alex Plant
Cc: Ofwat - Defra accelerated process; Regulation; Georgie Hunt
Subject: RE: Accelerated process: ANH-AP-NN-002
Attachments: PR24 WINEP supporting guidance - catchments where nutrient neutrality is advised (PR24) (1).pdf

Importance: Low

Dear Abbas,

Thank you for the opportunity to provide some additional information on the Nutrient Neutrality component of our AID submission and the inclusion of Nitrogen removal schemes.

1. What are the legal requirements for meeting the N standards in these areas. Is N a constraint in these areas?
 - The EA and Natural England issued the attached supporting guidance note which specified the River Wensum SAC (Special Area of Conservation) and the Broads SAC as catchments where Nutrient Neutrality is advised as a potential mitigation solution to enable development to proceed under the EU Habitats Directive. On the basis of this document, development sites in these areas have been held up with Planning Authorities unable to approve applications. In Norwich alone there are 52 development sites on hold because of this: [Mitigation credits could fix nutrient neutrality in Norwich | Eastern Daily Press \(edp24.co.uk\)](https://www.edp24.co.uk/news/norwich-news/mitigation-credits-could-fix-nutrient-neutrality-in-norwich/). The note specifies Phosphorus only as the Nutrient of concern for the Wensum, but both Nitrogen and Phosphorus for the Broads. The developments referenced above discharge to our water recycling centre at Whitlingham (one of our proposed sites) which discharges to the Broads and is therefore subject to both N and P constraints. Our view is that, as the two catchments are hydraulically connected with the Wensum upstream, any removal of Nitrogen at sites in the Wensum would then allow Planning Authorities downstream to approve applications for development sites in the Broads. The precise detail of how N and P credits could be sold to developers for this purpose is yet to be established, hence our uncertainty of how much partnership funding we could secure for this investment, but we believe there will be potential there, and appetite from developers, as has been seen with the Norwich Council homes water efficiency scheme described in the article.
2. I can see that you want to deliver benefits early in terms in unlocking housing in the wider Broads areas – but will there be costs savings if these are delivered together. If so, can you identify them please
 - As explained in previous communication on both AID and WINEP, the costs provided are still draft and subject to movement as we refine our estimates to account for the latest cost information from: our supply chain, our benchmarking activities for PR24 and our assumptions on RPE and Frontier Shift. We will confirm final costing of all schemes in our Business Plan submission. Our overhead models used in the estimation of scheme costs for our business plan apply the same overhead to both schemes to cover things like site set up costs that could be shared. As that rate is sourced from actual delivered projects, some of which did share site set up, our approach has been to apply this rate to all projects in the planning stage where there is significant uncertainty about the timing of schemes. Whilst for these particular investments it is more likely the timing would coincide, the time on site for the Phosphorus schemes is already reduced by the offsite construction approach we use in delivery, and so the additional savings for cabin hire and site supervision of co-delivery would be small.

We hope this provides you with the information you need to make a decision and look forward to hearing from Defra later this month

Regards,

Matt

From: Abbas Amin
Sent: 28 February 2023 09:05
To: Matthew Humphrey ; Alex Plant
Cc: Ofwat - Defra accelerated process
Subject: RE: Accelerated process: ANH-AP-NN-002

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Hi Matt/Alex,

Having reviewed your submission, I just wanted to follow up with a few questions on your proposals.

I note that you are looking to accelerate Nitrogen schemes within the Nutrient Neutrality driver.

- 1) What are the legal requirements for meeting the N standards in these areas. Is N a constraint in these areas
- 2) I can see that you want to deliver benefits early in terms in unlocking housing in the wider Broads areas – but will there be costs savings if these are delivered together. If so, can you identify them please

Due to the accelerated nature of this programme, please get back to us COP Thursday 2nd March.

Best,
Abbas

From: Matthew Humphrey <mHumphrey@anglianwater.co.uk>
Sent: 21 February 2023 13:04
To: Alex Plant <aPlant2@anglianwater.co.uk>; Abbas Amin <Abbas.Amin@ofwat.gov.uk>
Subject: RE: Accelerated process: ANH-AP-NN-002

Hi Abbas

As per Alex's email please find attached

Matt

From: Alex Plant <aPlant2@anglianwater.co.uk>
Sent: 21 February 2023 12:20
To: Abbas Amin <Abbas.Amin@ofwat.gov.uk>; Matthew Humphrey <mHumphrey@anglianwater.co.uk>
Subject: Re: Accelerated process: ANH-AP-NN-002

Hi Abbas, Matt is finalising the reply and should be with you by 1pm

Alex

Sent from [Outlook for Android](#)

From: Abbas Amin <Abbas.Amin@ofwat.gov.uk>
Sent: Monday, February 20, 2023 2:12:17 PM

To: Alex Plant <aPlant2@anglianwater.co.uk>
Subject: RE: Accelerated process: ANH-AP-NN-002

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Dear Alex,

I am writing to let you know that I need your response to my previous request by **13:00 Tuesday, instead of close of play Tuesday as originally requested**. This is due to some internal changes in our timelines that require us to move up our deadline.

I understand that this may be a tight turnaround, but I would appreciate it if you could prioritize this request and provide a response by the revised deadline. If this is not possible, please let me know as soon as possible so that we can explore alternative options. I apologise for the late change in the request deadline.

Thank you in advance for your cooperation and support. Please do not hesitate to contact me if you have any questions or concerns.

Best regards,
Abbas

From: Alex Plant <aPlant2@anglianwater.co.uk>
Sent: 16 February 2023 09:33
To: Ofwat - Defra accelerated process <Ofwat-DefraAcceleratedProcess@ofwat.gov.uk>; Regulation <Regulation@anglianwater.co.uk>
Cc: Davis, Keith <keith.davis@environment-agency.gov.uk>; Robin Price <rPrice2@anglianwater.co.uk>; Rice Darren <dRice@anglianwater.co.uk>; Humphrey Matthew <mHumphrey@anglianwater.co.uk>
Subject: Re: Accelerated process: ANH-AP-NN-002

Thanks Abbas

Yes, will aim for then

Kind regards

Alex

Sent from [Outlook for Android](#)

From: Ofwat - Defra accelerated process <Ofwat-DefraAcceleratedProcess@ofwat.gov.uk>
Sent: Thursday, February 16, 2023 9:23:30 AM
To: Alex Plant <aPlant2@anglianwater.co.uk>; Regulation <Regulation@anglianwater.co.uk>
Cc: Davis, Keith <keith.davis@environment-agency.gov.uk>; Robin Price <rPrice2@anglianwater.co.uk>; Darren Rice <dRice@anglianwater.co.uk>; Matthew Humphrey <mHumphrey@anglianwater.co.uk>
Subject: RE: Accelerated process: ANH-AP-NN-002

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Alex,

Could you get back to us COP Tuesday 21st?

Best,
Abbas

From: Alex Plant <aPlant2@anglianwater.co.uk>
Sent: 16 February 2023 08:47
To: Ofwat - Defra accelerated process <Ofwat-DefraAcceleratedProcess@ofwat.gov.uk>; Regulation <Regulation@anglianwater.co.uk>
Cc: Davis, Keith <keith.davis@environment-agency.gov.uk>; Robin Price <rPrice2@anglianwater.co.uk>; Rice Darren <dRice@anglianwater.co.uk>; Humphrey Matthew <mHumphrey@anglianwater.co.uk>
Subject: Re: Accelerated process: ANH-AP-NN-002

Dear Ofwat,

Unfortunately the key people involved in this work are all away this week. Would it be possible to have a short extension to allow time to consult those colleagues once they are back next week (appreciate the tight timescales but hope this can be accommodated).

Thank you

Alex

Sent from [Outlook for Android](#)

From: Ofwat - Defra accelerated process <Ofwat-DefraAcceleratedProcess@ofwat.gov.uk>
Sent: Wednesday, February 15, 2023 4:23:37 PM
To: Alex Plant <aPlant2@anglianwater.co.uk>; Regulation <Regulation@anglianwater.co.uk>
Cc: Davis, Keith <keith.davis@environment-agency.gov.uk>
Subject: Accelerated process: ANH-AP-NN-002

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Hi,

Please see the attached query.

Please get back to us COP Friday 17th.

Best,
Ofwat

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