



**Anglian Water Services**

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Our ref ScpR.IGET.NSIP.22.ds

Stephanie Newman  
EIA Advisor  
The Planning Inspectorate

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4 October 2022

Dear Stephanie

**Immingham Green Energy Terminal  
EIA Scoping Report consultation**

Thank you for the opportunity to comment on the scoping report for the above project which is within North East Lincolnshire. I note at this point that the consultation response is outside of the timescale a response was requested.

Anglian Water is the appointed water and sewerage undertaker for the site shown on Figure 1 in Appendix A. The following response is submitted on behalf of Anglian Water in its statutory capacity and relates to potable water and water assets along with wastewater and water recycling assets.

- The Scheme – Existing infrastructure

There are significant existing Anglian Water assets including water mains along the south side of the site and within the roads to the north and east. Water recycling assets including rising mains also run to the south, east and north of the site. Maps of Anglian Water's assets are available to view at the following address:

<http://www.digdat.co.uk/>

Anglian Water notes that the promoter identifies at page 211 that surface water on site is managed by the Port of Immingham (17.2.21). We conclude from this that no surface water will be managed via the Anglian Water public sewer network. At 17.2.3 the promoter comments on the proximity of an Anglian Water 600mm foul sewer in proximity to the site boundary. The rising main on the southern edge of the site is 450mm, the sewers to the north and east of 300mm with connections of 150mm. These assets are part of and serve the wider Immingham Water Recycling catchment including the town of Immingham to the west.

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We note that other than a reference to a 'main water pipe' (2.2.7) the promoter does not refer to the water supply network assets which run along Kings Road, Queens Road and the southern boundary of the site. Through consultation proposed in 17.7.1 Anglian Water would want to ensure the location and nature of these assets is identified and protected. To reduce the need for diversions and the attendant carbon impacts of those works, ground investigation would enable the promoter to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure. This approach would accord with Project Objective C. at 2.4.2.

The Scoping Report refers to Anglian Water assets and that:

- the project relies upon a connection to the 'local sewer network' (21.4.7),
- a potable water supply connection is required to a 'local main water network' (2.4.20)
- a 'site wide cooling water system' is required (2.4.22)

In view of the guidance in the National Policy Statements we would have anticipated that the scoping would have included and then considered the approach to water supply, water resources and water recycling assets. Anglian Water requests that these points are assessed early in the EIA to set out how the project will be supplied with water, its wastewater managed, how water assets serving residents and business will be protected and how design has been altered to reduce the need for new water infrastructure or the diversion of existing assets.

We support the inclusion of water (17.5.3) including water infrastructure in the Construction Environment Management Plan and Water Management Plan. The CEMP and a WMP should include steps to remove the risk of damage to Anglian Water assets from plant and machinery including haul roads. Further advice on minimising and then relocating Anglian Water existing assets can be obtained from:

[connections@anglianwater.co.uk](mailto:connections@anglianwater.co.uk)

- Water Resources

The site is in the East Lincolnshire Water Resource Zone (WRZ), which supplies water to Grimsby the eastern parts of Lincolnshire WRZ and serves communities as far south as Boston. We note that whilst the scoping considers water environment impacts it does not look at water resources. As the site is within an area of 'serious water stress' designated by the Environment Agency and water is used in the project construction and operation this indicates that water resources should be assessed in the EIA, learning lessons from previous projects such as Sizewell C. This may include consideration of the Socio- Economic effects of the use of water for the project in the context of growth and climate change as well the potential impacts on communities and business if these services are distributed. There is no reference to assessment of the carbon costs of relocating water infrastructure if assets are impacted during construction or operation.

Anglian Water notes that the applicant has not sought to scope these matters out by providing sufficient information to reach a conclusion that the projects impact regarding water supply as well as water recycling and water quality, are not significant.

- Engagement

Anglian Water would welcome the instigation of discussions with Associated British Ports as the prospective applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. Consultation at the statutory PEIR stage would in our view be too late to inform design and may result in delays to the project. We would recommend discussion on the following issues:

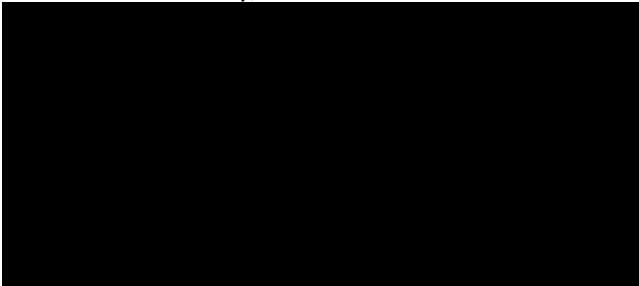
1. Requirement for potable and raw water supplies
2. Impact of development on Anglian Water's assets including groundwater and water abstraction and the need for mitigation
3. Requirement for water recycling connections
4. The design of the project to minimise interaction with Anglian Water assets and specifically to avoid the need for diversions which have carbon costs
5. Confirmation of the project's cumulative impacts (if any) with Anglian Water projects
6. Draft Protective Provisions

Further advice on water and wastewater capacity and options can be obtained by contacting Anglian Water's Pre-Development Team at:

[planningliasion@anglianwater.co.uk](mailto:planningliasion@anglianwater.co.uk)

Please do not hesitate to contact me should you require clarification on the above response or during the pre- application to decision stages of the project.

Yours sincerely,



Darl Sweetland DMS MRTPI  
Spatial Planning Manager