

Dear Ms Beale,
Please treat this email as a further supplementary representation concerning application UTT/26/1635/OP and place it on

Website copy - postal address removed

identified two separate and substantial water-infrastructure issues. They must not be treated as one general "water" matter because different companies and regulators are responsible for answering them.

ISSUE ONE - CLEAN-WATER SUPPLY, NETWORK CAPACITY AND PRESSURE

Affinity Water has stated that sufficient water is available within the wider region. That does not establish that the local Great Dunmow network can deliver the required water at adequate pressure, particularly during peak demand.

The housing evidence indicates approximately:

- 4,576 occupied households in Great Dunmow at the 2021 Census;
- 5,218 household-equivalents by March 2024;
- 7,287 after identified approved and committed developments are completed; and
- 8,137 if the proposed 850 dwellings are added.

The 850 homes alone would create estimated household demand of approximately 0.236 to 0.345 million litres per day, depending upon the consumption assumption used. The identified committed development and the proposed application together represent approximately 0.809 to 1.185 million litres per day of household demand. This excludes the school, nursery, healthcare facility, shops, other commercial uses and network leakage.

Affinity Water's Stort Water Resource Zone plan shows a forecast surplus of only 0.627 million litres per day in 2030/31. That forecast depends upon substantial reductions in household consumption and leakage. Regulators have subsequently reported that Affinity's actual dry-year household consumption was materially above its forecast and raised serious concerns about its security-of-supply and headroom assumptions.

More importantly, Uttlesford's own Stage 2 Water Cycle Study records that Affinity Water's hydraulic modelling found pressure problems at critical points and that major reinforcement - normally new pipelines and potentially pumping stations - is required. The purpose of that reinforcement is to restore capacity and service lost through development, rather than to create unlimited new capacity.

The applicant has not supplied the missing site-specific evidence. Its Utility Feasibility Report:

- identifies an existing four-inch asbestos-cement distribution main along The Broadway;
- provides no calculated peak water demand;
- states that a pre-development capacity enquiry is still to be submitted;
- assumes a possible connection approximately 15 metres from the entrance; and
- reaches its preliminary conclusion before the necessary enquiries have been completed.

Affinity Water should therefore be required to provide a formal, application-specific response showing:

1. Current average-day and peak-day water demand in Great Dunmow.
2. Current pressure at the network's critical points.
3. The approved developments and build-out assumptions included in its model.
4. Modelled pressure after all approved and committed Great Dunmow developments are occupied.
5. Modelled pressure after those developments plus the complete 850-home mixed-use proposal.

6. Whether the existing four-inch asbestos-cement main can supply the full development.
 7. The scope, completion status and quantified benefit of the Dunmow Reinforcement project.
 8. Any further mains, pumps or storage required and the maximum number of homes that could be occupied before that infrastructure is completed.
 9. Confirmation that existing customers would not experience reduced pressure, reliability or fire-flow performance.
- Regional resource planning is not evidence of adequate local hydraulic capacity. Until these questions have been answered through a completed hydraulic assessment, the application has not demonstrated that a dependable clean-water supply can be provided without harming the service received by existing residents.

ISSUE TWO - FOUL SEWER, TREATMENT CAPACITY AND THE RIVER CHELMER

This is a separate and still more immediate problem for Anglian Water and the Environment Agency.

Anglian Water has confirmed that Great Dunmow Water Recycling Centre currently lacks capacity to accommodate additional flows from new development.

The works has an existing permitted dry-weather flow of 1.900 million litres per day. Anglian Water records the following actual Q90 dry-weather flows:

- 2021: 2.256 million litres per day;
- 2022: 2.213 million litres per day;
- 2023: 2.398 million litres per day;
- 2024: 2.558 million litres per day; and
- 2025: 2.468 million litres per day.

The latest published figure is approximately 30% above the existing permit. The five-year average is approximately 25% above it. Anglian Water identifies the works as non-compliant and subject to an Environment Agency enforcement notice.

Using the published 2025 flow as the starting point, household wastewater alone is estimated to increase to:

- approximately 2.930 to 3.144 million litres per day after the remaining approved and committed homes; and
- approximately 3.153 to 3.472 million litres per day after those developments and the proposed 850 homes.

These figures exclude wastewater from the proposed school, nursery, healthcare facility, shops, business uses, groundwater infiltration and other non-household sources.

The Environment Agency's 2025 records also show 16 counted spills from the two Great Dunmow treatment-works storm-overflow outlets, lasting a combined 85 hours and 41 minutes.

The local sewer network has not been demonstrated to have capacity either. The applicant acknowledges that the closest 150 mm sewers at Church End and St Edmunds Lane are too small. It identifies possible connections to a 300 mm sewer approximately 0.5 kilometres away or a 525 mm sewer approximately 1.4 kilometres away, but proposes to leave modelling, route selection and reinforcement design until after outline permission.

The proposed development would use a pumping station and rising main. The applicant's stated residential design basis equates to a peak pumped flow of approximately 42.5 litres per second for the 850 dwellings alone, before the school and local-centre uses. No completed network model has been produced showing where that flow would go or its effect upon sewer surcharge, flooding, pumping stations and storm overflows.

A future treatment-works expansion has been proposed, but it is not capacity that exists today. Material uncertainties remain:

- the new environmental permit has not been granted;
- the works has not been constructed or commissioned;
- the proposal is described inconsistently as supporting 7,604 population equivalent, 9,856 population equivalent or "up to 1,200 homes";
- it has not been established which approved developments are included;
- correction of the existing compliance failure is expressly excluded from the growth scheme's funding; and
- the applicant suggests tankering sewage to an unidentified treatment works if permanent infrastructure is unavailable.

Anglian Water and the Environment Agency should therefore be required to provide:

1. The current environmental permit and enforcement notice.
2. Current treatment, process, storm-storage and compliance information.
3. A complete reconciliation of the 7,604, 9,856 and 1,200-home capacity descriptions.
4. The full list of approved developments and non-household loads included in the upgrade.
5. Confirmation that all 850 homes and every proposed non-residential use are included.
6. A separate programme for correcting the existing compliance and overflow problems.
7. A completed sewer-network model covering existing demand, full committed development and committed development plus this application.
8. The final connection point, pumping arrangement, rising-main route and necessary sewer reinforcement.
9. Evidence that the scheme would not worsen storm-overflow operation, sewer flooding or the condition of the River Chelmer.
10. A confirmed, funded and enforceable delivery programme tied to occupation.

REQUEST TO THE COUNCIL

Please:

- place this representation on the public planning file;
- refer the clean-water questions formally to Affinity Water;
- refer the wastewater questions formally to Anglian Water and the Environment Agency;
- publish their substantive responses; and
- confirm that the application will not be determined until both issues have been properly resolved.

A general statement that the relevant utility company will deal with matters later is not sufficient. Both systems must be assessed against existing demand, the complete approved development pipeline and the whole 850-home mixed-use proposal.

No occupation should be permitted until all necessary clean-water and wastewater infrastructure has been funded, completed, commissioned and independently verified as capable of serving the development without reducing service to existing residents, increasing sewer flooding or worsening discharges to the River Chelmer.

I reserve the right to submit the supporting calculations and any further information received from the relevant companies and regulators.

Please confirm receipt and confirm when this representation has been published.

Kind regards,

Carl Rolph

Save Church End