

15.04.2026

East Park Energy – Applicant Responses to Relevant Representations

Environment Agency advice note for NSIPs regarding the request for a water supply strategy

NPS EN-1 (Energy infrastructure) sets out that the Environmental Statement should describe the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance.

The location of this development is in an area of serious water stress (as identified in our report Water stressed areas – 2021 classification

(<https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>).

Water demand

The proposed development describes the following consumptive uses of water during construction:

- Potable water supply to welfare stations for domestic use
- An adequate supply of water on site for dust suppression
- Use of water for horizontal directional drilling fluids (bentonite clay mixing)
- Wheel washing and concrete wash

The proposed development describes the following consumptive uses of water during operation:

- Panel cleaning
- BESS Water storage for fire fighting

Water supply

Abstraction

The combined water demands for volumes which exceed 20m³ per day is subject to an abstraction licence if it is supplied from surface water or from groundwater.

Water company supply

Anglian Water Services (AWS), who supply the region of this development, are subject to licence reductions (caps) on its groundwater licences to manage the risk of deterioration of the associated water bodies, according to the principles set out in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations). The company's 2024 water resources management plan (WRMP24) has set out that it will be reliant on seeking to defer some licence reductions until new strategic supplies can be developed. This means that until these new sustainable supplies are available, supplies to existing customers and those to supply new development will be as a result of deferring some licence changes under Regulation 19 of the Water Framework Regulations which risks WFD deterioration.

AWS has adopted a “Non-Domestic Water Requests Policy” for which it asks of applicants who require non-domestic water supply to complete Water Resource Assessment to understand water demands, water efficiency measures and to effectively forecast water supply requirements. The environment agency fully endorses this approach which would satisfy our request for a water supply strategy.

Why the EA asks for a Water supply strategy

The UK has a deficit of 5bn litres per day in its water supply and demand forecast to 2050. Whilst strategic resources options are being developed and reductions in leakage and consumptions are expected, water company supply is more limited and regional water resources planning is more important than ever.

There is a reliance on the Environmental Impact Assessment to evaluate water resources impacts *of* the scheme however, the impacts *on* water availability *on* the scheme are rarely considered. Evaluation of the environmental impacts of abstraction are part of the National permitting service and often, the permitting requirements of a scheme are only considered post planning decision. Whilst we do not wish to duplicate work between the planning process and the permitting process, consideration for the impacts of water availability *upon* the scheme can avoid encountering significant problems and delays pre-commencement if it is considered as part of the environmental impacts assessment as NPS EN-1 describes.

What should a Water supply strategy include?

The Environmental Impact assessment should include information which describes all of the consumptive uses of water anticipated during the construction phase of the project and should attempt to quantify the volumes of water required for each. This does not have to be accurate and can be estimated at this stage. The water uses the EA has identified in the various chapters of the ES to date are listed above.

The strategy should also include a review of the Abstraction licensing strategy for the catchment. This can be found on our website found here:

[Abstraction licensing strategies \(CAMS process\) - GOV.UK](#)

Finally, the assessment should provide a brief options appraisal of the sources of supply which are available to the project. For example:

Water company supply

The water undertaker may be able to supply all water demands of the project, early engagement with them is required to establish the certainty of this of if non-domestic uses will require alternative sources of supply. Anglian water recommends a Water Resources Assessment which for which a template is provided which the EA endorses and fulfils the requirements of a water supply strategy.

3rd party tankers

For small quantities of water, tankering volumes to site may be viable however this adds to the numbers of HGVs on local roads which is something local authorities will wish to be aware of and may object to. In order to evaluate how many more HGVs are needed an estimate of volumes and/or number of days is required. If the local authority objects, other sources of supply will need to be considered.

Surface water abstraction

A review of the abstraction licensing strategy will provide the applicant with an indication of how reliable water availability is in the catchment. Most licences are issued with a hands off flow conditions in order to protect low flows. However, water scarce areas or catchments can be restricted to medium or even high flows meaning that access to water will not be available in the summer when peak demand for dust suppression is likely for example. The solution to this may be to incorporate temporary storage to construction areas to buffer times of unavailability. Applicants should be aware of the determination period of up to 4 months if advertising is required.

Groundwater abstraction

A review of the abstraction licensing strategy will provide the applicant with an indication of how reliable water availability is in aquifers associated with the catchment. Groundwater licences do not come with the same restrictions as surface water however they may be treated the same if from superficial geology such as sands and gravels being deemed to be in continuity. Many principal aquifers are closed to new applications due to over-abstraction. Applicants should be aware of the determination period of up to 4 months if advertising is required.

Licence trading

If water availability is not practical, a trade with an existing licence holder may provide the quantities required. The EA would need to make any changes necessary to the existing licence to reflect the use of water but the trade would need to be identified and arranged by the applicant. Applicants should be aware of the determination period of up to 4 months if advertising is required.

Rainwater harvesting

Collection and storage of rain water is outside of regulation and in the same way as storing abstracted winter water, can buffer periods of unavailability. Note that attenuated run off which overflows or discharges to watercourses is withing regulation and would require a licence.

Benefits to the applicant

The Environment Agency accepts that solar development often requires temporary water supply for construction and relatively small quantities for both construction and operational phases of the project. However, permitting requirements and planning for water supply should not be underestimated as determination of licences can take up to 4 months not including pre applications. A basic water supply strategy:

- Provides a plan B to water company supply in the case that it is not available for non-domestic purposes;
- Evaluates the scope of available alternative sources;
- Manages expectations of water availability and the implications for likely licence conditions such as hands off flows for the scheme;
- Allows time for the development of solutions such as storage or for a mix of sources to be considered in advance of detailed design;
- Provides clarity on permits likely to be required;
- Reduces the risk of problem solving and process lead times causing delays pre commencement;