



APRIL 2024

Planning Statement

Beeston Park Wastewater Treatment Works

Iceni Projects Limited on behalf of
Stretton Beeston

April 2024

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ON BEHALF OF STRETTON
BEESTON

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Planning Statement
BEESTON PARK WASTEWATER TREATMENT WORKS

CONTENTS

1.	INTRODUCTION	1
2.	APPLICATION SITE AND BACKGROUND	3
3.	PROPOSED DEVELOPMENT.....	7
4.	PLANNING POLICY	8
5.	PLANNING ANALYSIS	20
6.	PLANNING BALANCE AND CONCLUSION	25

1. INTRODUCTION

1.1 This Planning Statement has been prepared by Icen Projects Limited ('Icen') on behalf of Stretton Beeston Limited ("the Applicant") in support of a planning application for the construction of a wastewater treatment works (WwTW) at Beeston Park, Norwich ('the site'). The Site sits within the administrative boundary of Broadland District Council which sits within Norfolk County Council.

1.2 This application is submitted in full. The proposed description of development is as follows:

"Full planning application for the creation of a wastewater treatment works including associated engineering works and access"

1.3 The proposal is associated with the Land to the North of Sprowston which secured outline permission for a mixed-use development comprising up to 3,520 dwellings along with employment and commercial floorspace (planning ref: 20121516) in 2016. This was subsequently amended under application ref: 20161058 in 2017. The first reserved matters application was recently approved in September 2023 for Phase One Strategic Infrastructure and agreement of details for conditions 4, 5, 10, 11, 27, 28, 31, 32, 33, 35 and 36 of 20161058(ref: 20180708). This has been update updated by NMAs 20211172 and 2023/1604. The proposed WwTW will ensure any additional wastewater load associated with incoming development is neutralised before discharge is released back into the environment.

1.4 The purpose of this Planning Statement is to provide Norfolk County Council ('NCC') with an overall summary of the existing site and surroundings; the relevant planning history for the site and to provide justification for the Proposed Development in the context of NCC's Minerals and Waste Development Framework, Broadland District Council ('BDC's) Development Plan and national planning policies.

Submission Documents

1.5 In addition to this Planning Statement prepared by Icen Projects as part of the planning application, the following documents and drawings have been prepared and submitted in support of this planning application:

Document title	Author
Site Location Plan	Civic Engineers
Supporting Plans	Severn Trent Connect

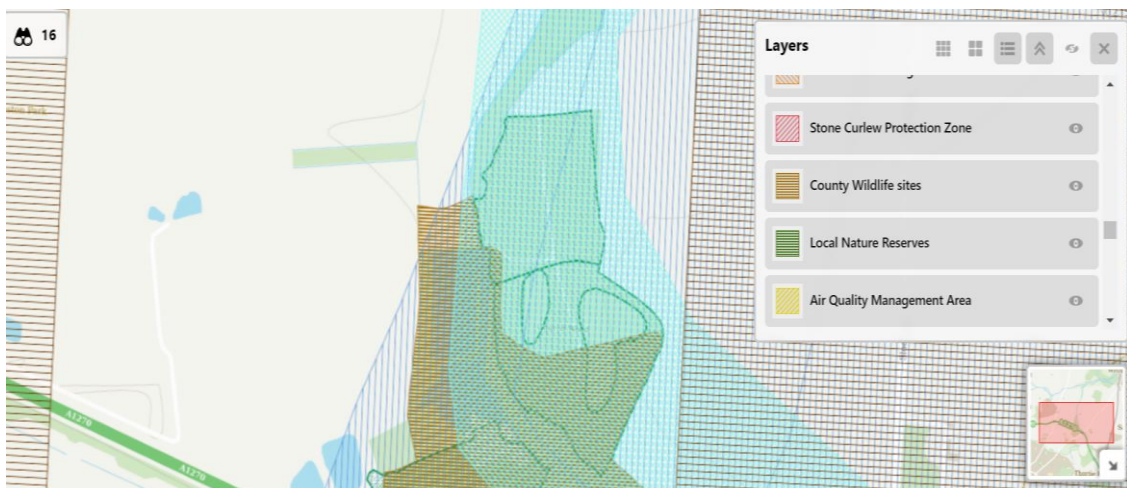
Document title	Author
Detailed Design Specification	Severn Trent Connect
Landscape Strategy Plan	Aspect
Archaeology Desk Based Assessment	Wessex Archaeology
Flood Risk Assessment	Water Environment Ltd
Baseline Ecological Impact Assessment	Hopkins Ecology
BNG Statutory Metric	Hopkins Ecology
Geoenvironmental Report	Ecologia

2. APPLICATION SITE AND BACKGROUND

Site Description

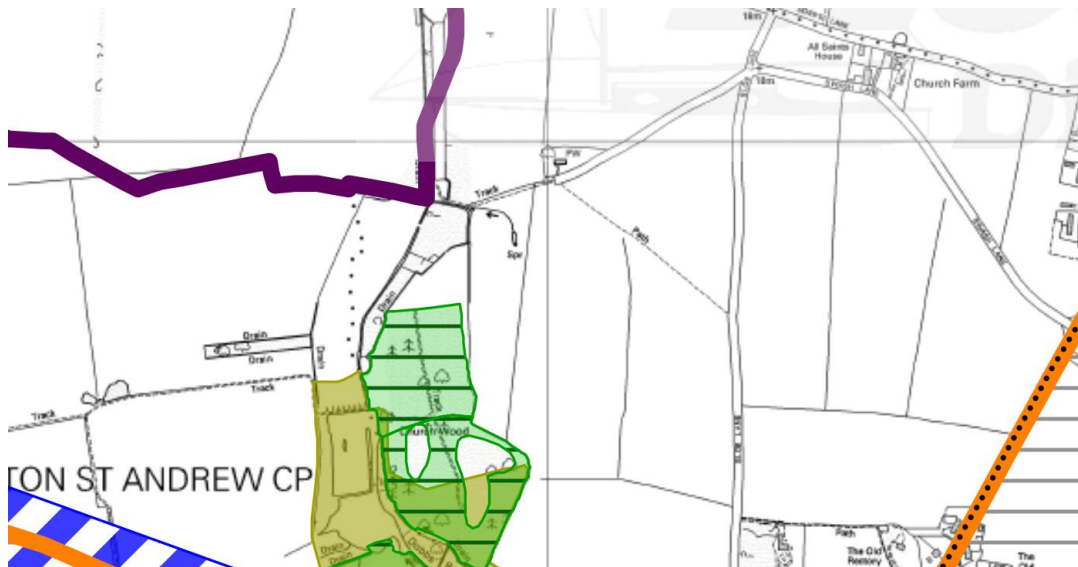
- 2.1 The Site is located to the northwest of Dobbs' Beck and comprises undeveloped arable land which is rectangular in shape. The majority of the site comprises a relatively flat lying field. This main field comprises rough, relatively long vegetation. There are mature trees and hedgerows running along the Site's eastern boundary.
- 2.2 The Site is surrounded by agricultural land. Dobbs' Beck and the proposed Beeston Wetlands are located southeast of the Site. There is ancient woodland circa 150m east of the Site and this is elevated from the Site.
- 2.3 The Broadland Northway (A1270) runs parallel to the southern boundary circa 400m south of the Site. There is a private access road into the Site linking onto the A1270. Norwich town centre is located approximately 4.8 miles southwest of the Site.
- 2.4 The site is not allocated within the Minerals and Waste Development framework and a wastewater treatment site, and it is unallocated in the Development Plan. There are limited designations impacting the Site. However, the land to the southeast of the Site is a designated as a Locally Defined Area of Biodiversity/Geodiversity Importance.

Figure 2.1: Minerals and Waste Development Framework Designations



Source: Mineral and Waste Development Framework Interactive Policies Map

Figure 2.2 – Local Plan Designations



Source: Broadland Development Management Plan (adopted in 2015)

- 2.5 There are no heritage assets located on or immediately adjacent to the site. However, there is Ancient Woodland circa 150m east of the western boundary.
- 2.6 There are no statutory or non-statutory designated sites of nature conservation interest within or adjacent to the application site. No trees on or within the surrounding area of the site are covered by Tree Preservation Orders.
- 2.7 The Site is located within Flood Zone 1, an area with low probability of flooding.
- 2.8 According to the Norfolk Highways and Public Rights of Way map, there are no PRow crossing the Site. This considered, there is a PRow footpath running adjacent to the Site boundary along Broadland Northway.

Planning History

- 2.9 According to NCC's and BDC's Planning Application register, there have been no planning applications submitted on the Site. However, there are applications in the vicinity that are of key importance to this proposal. Namely, the urban extension at Beeston Park which is detailed below.

Beeston Park

- 2.10 Outline planning permission has been secured for an urban extension to the northeast of Norwich in February 2016 (planning ref: 20121516). The development description is as follows:

The Development of Land North of Sprowston and Old Catton to Provide Up To 3,520 Dwellings; Up To 16,800 Square Metres of Employment Space; Up To 8,800 Square Metres of Space For Shops, Services, Cafes, Restaurants and Drinking Establishments; Up To 1,000 Square Metres of Hotel Accommodation; Two Primary Schools; Up To 2,000 Square Metres of Community Space Including A Health Centre, Library and Community Halls; An Energy Centre; Cycle and Vehicle Parking For Residents, Visitors and Staff; Landscaping and Public Open Space for Amenity, Recreation and Food-Growing; Ecological Mitigation and Enhancement; Utilities and Sustainable Urban Drainage Infrastructure; And Pedestrian, Cycle and Vehicular Accesses (Outline)

- 2.11 The first reserved matters application (RMA) was approved in September 2023 for the strategy for delivery of Phase One of Beeston Park. This includes delivery of a package of strategic infrastructure to enable the disposal of serviced parcels to housing developers, together with the handover of the Phase One school site to the Local Education Authority (planning ref: 20180708).
- 2.12 The RMA package includes:
- the proposed East-West Link Road (EWLR) between St Faith's Road and Norwich Rugby Club, incorporating new junctions with St Faith's Road and with Buxton Road and associated landscaping;
 - surface water drainage attenuation areas and connections to serve both the EWLR and future development parcels, including associated landscaping; and
 - utilities to serve future development parcels.
- 2.13 The Broads, which is a Special Area of Conservation, comprising many different Sites of Special Scientific Interest and is designated under the Ramsar Convention under the name 'The Broadland'. Five of the units of the Broads are in unfavourable condition due to water quality, therefore all development in the catchment has to demonstrate 'nutrient neutrality'.
- 2.14 As the wider outline site is situated in the Bure Operational Catchment area and the Yare Operations Catchment area, the development will be required to deliver nutrient neutrality. A Nutrient Neutrality Assessment and Mitigation Strategy (NNAMS) was prepared and approved under the RMA (planning ref: 20180708). This establishes that the level of nitrates and phosphates which needs to be mitigated, as agreed with the Council, as 2,723.43 kgN/year and 313.63 kgP/year using the Norfolk Calculator.
- 2.15 In response to this requirement, the NNAMS sets out a multi-faceted mitigation strategy in order to demonstrate nutrient neutrality. This includes:

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1. On-site wastewater treatment works (WwTW) to be constructed, adopted, maintained and operated by (Severn Trent Connect). The outfall from this facility will be to a purpose-built wetland.
 2. Sustainable Drainage Systems will be used within the site to reduce nutrient pollution from surface water runoff. These systems will be optimised to remove nutrients and will likely include elements of bioretention.
 3. Several existing septic tanks, currently serving single houses, will be upgraded to a more modern package treatment plant that will be optimised to remove nutrients, with several others being connected into the new WwTW.
 4. An offsite wetland has been proposed at Dobb's Beck to the northwest of the site. This will remove sufficient nutrients from the Beck to offset the residual nutrient budget after the previous mitigation measures are applied.

2.16 This application relates to the stage 1 of the strategy listed above.. The Site, which sits immediately adjacent to the off-site wetlands which will be delivered under stage 4, is within the same ownership as the wider application. While the proposal will be located outside of the development, will still be delivered as a site specific WwTW that sits outside the initial red line boundary.

2.17 The NNAMS details that the onsite WwTW will be adopted, maintained, and operated in the long-term by Severn Trent Connect ('STC') in their capacity as the local statutory wastewater undertaker. Severn Trent has been involved in this application from the outset and are responsible for preparing the technical drawings which have been submitted alongside this application.

3. PROPOSED DEVELOPMENT

3.1 This planning application seeks planning permission for the following:

“Full planning application for the creation of a wastewater treatment works including associated engineering works and access”

- 3.2 Our client is seeking planning permission for the creation of a WwTW to mitigate the nutrient output arising from the consented urban extension to the northeast of Norwich which is set to deliver a mixed-use urban extension for up to 3,520 Dwellings.
- 3.3 In terms of foul water, the calculations identify that all wastewater generated by the development will be discharged within the Bure catchment. It has been identified that a site specific WwTW will be required. It is noted that, as the WwTW will require a minimum flow to operate, temporary tankering will take place to allow initial occupations. This application relates to the permanent WwTW.
- 3.4 The specification of this proposal has been agreed in the approved NNAMS which determines that WwTWs will operate at 90% of a bespoke license limit of 0.15mg/l for TP and 10mg/l for TN.
- 3.5 Planning permission has separately been sought for a wetland at Dobb’s Beck which will take water from Dobb’s Beck, where Rackheath WwTW also discharges. The treated effluent from the new WwTW will also be discharged in to the wetlands and supports the proposed location of the new WwtW.
- 3.6 The new WwTW will be constructed/managed/maintained by Severn Trent Connect who are suitably placed/qualified to do so under the Water Industry Act 1991 as a NAV. STC has played a fundamental role in designing the WwTW and are responsible for preparing the Beeston WwTW Basis of Design and supporting technical plans.
- 3.7 The proposal has been designed in accordance with the site-specific Nutrient Neutrality requirements, where treated final effluent shall contain no more than 10mg/l Total Nitrogen and 0.15mg/l Total Phosphorous.
- 3.8 As shown in Severn Trent’s plans, the proposed WwTW will also consist of an inlet works, feed and final effluent pumping stations, temporary influent buffer tank, tertiary solids removal, sludge holding and thickening facilities, and chemical dosing equipment. The proposal includes extensive planting along the Site’s boundary to mitigate any impact on the wider landscape. Details of the technical design justification are included in the Beeston WwTW Basis of Design document.

4. PLANNING POLICY

4.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section identifies the principal planning policy considerations which have informed the development proposals, and which provide the context for the consideration of this planning application, as well as other material considerations. The Development Plan comprises policies from the following:

- Core Strategy and Minerals and Waster Development Management Policies Development Plan Document 2010-2026 (adopted September 2011)
- Waste Site Specific Allocations Development Plan Document (adopted October 2013)
- Joint Core Strategy DPD (2011);
- Development Management Plan DPD (2015); and
- Site Allocations DPD (2016).

4.2 Other material considerations include:

- National Planning Policy Framework (2021);
- National Planning Practice Guidance (2021); and
- Landscape Character Assessment (LCA) SPD (2013).

4.3 Broadland District and South Norfolk Council are working with Norwich City Council and Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP). The GNLP will include strategic policies to guide future development and plans to protect the environment. It will look to ensure that delivery of development is done in a way which promotes sustainability and the effective functioning of the whole area.

4.4 The GNLP is in the advanced stages of the adoption process, with Broadland District Council adopting it in 28 March 2024, however it is subject to a 6-week legal challenge period which ends 10 May 2024.

4.5 As the GNLP is in the advanced stages of local plan preparation and have been through examination, the policies will hold weight in line with paragraph 48 of the NPPF which sets out that local planning authorities may give weight to relevant policies in emerging plans according to the stage of

preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given).

National Planning Policy

4.6 The National Planning Policy Framework (NPPF) provides the planning policies for England and how these should be applied. This section provides an overview of the Government’s national planning policy and guidance that is relevant to the proposed development.

Table 4.1 Relevant National Planning Policy

Achieving Sustainable Development	At the heart of the NPPF is a presumption in favour of sustainable development, to ensure that sustainable development is pursued in a positive way. Sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs (Paragraph 7).
Decision Taking	Local planning authorities are encouraged to approach decision in a positive manner. Decision makers should seek to approve applications for sustainable development where possible (paragraph 38)
Promoting sustainable transport	Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (paragraph 114)
Conserving and enhancing the natural environment	<p>Planning decisions should contribute to and enhance the natural and local environment. Importantly, this includes preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans. Decisions should consider the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland (paragraph 180).</p> <p>Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists (paragraph 186).</p>
Conserving and Enhancing the Historic Environment	In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based

	assessment and, where necessary, a field evaluation (paragraph 200).
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Norfolk Minerals and Waste Development Framework

4.7 This Framework contains policies for use in making decisions on planning applications for mineral extraction and associated development and waste management facilities, and in the selection of specific site allocations in Norfolk. Key documents of relevance to this application include:

- Core Strategy and Minerals and Waster Development Management Policies Development Plan Document 2010-2026 (adopted September 2011)
- Waste Site Specific Allocations Development Plan Document (adopted October 2013)

4.8 Policies of most relevance to this application are summarised below:

Table 4.2 Core Strategy and Minerals and Waster Development Management Policies Development Plan Document 2010-2026

Policy Number	Policy Synopsis
Policy CS11: Wastewater/ sewage infrastructure and treatment facilities	<p>New or extended waste water/sewage infrastructure and treatment facilities will be acceptable where such proposals aim to:</p> <ol style="list-style-type: none"> 1) treat a greater quantity of wastewater; and/or 2) improve the quality of discharged water; and/or 3) reduce the environmental impact of operation. <p>The developer will be required to demonstrate that the proposal can be located and operated without giving rise to unacceptable environmental, amenity and highways impacts.</p> <p>The co-location of anaerobic digestion plants with waste water/sewage treatment facilities will normally be acceptable, subject to the tests of policy CS7 being met.</p>
Policy CS14 – Environmental Protection	<p>The protection and enhancement of Norfolk’s natural and built environments is a vital consideration for future minerals extraction and associated development and waste management facilities in the county. In particular, developments must ensure that there are no unacceptable adverse impacts on, and ideally improvements to:</p> <ul style="list-style-type: none"> • Natural resources, including water, air and soil;

Policy Number	Policy Synopsis
	<ul style="list-style-type: none"> • The character and quality of the landscape and townscape, including nationally designated landscapes (the Norfolk Coast Area of Outstanding Natural Beauty and the Norfolk and Suffolk Broads); • Biodiversity and geodiversity, including nationally and internationally designated sites and species, habitats and sites identified in Biodiversity and Geodiversity Action Plans; • Heritage assets and their setting, and cultural assets; and • Residential amenity e.g. noise, vibration, dust, lighting, and visual intrusion.
Policy CS15 – Transport	All proposed minerals extraction and waste management facilities must assess and consider positively the potential for non-HGV transportation of materials to and/or from the facilities, principally by rail or water. This assessment must be included within the Transport Statement/Transport Assessment, if one is required (see Policy DM10).
Policy DM3 – Groundwater and Surface Water	Applicants will need to give due regard to the policies within the Environment Agency's document 'Groundwater Protection: Policy and Practice (GP3)' and demonstrate that proposed developments would not adversely impact upon groundwater quality or resources and surface water quality or resources. A hydrological/hydrogeological risk assessment must be submitted, where applicable, to demonstrate this to the satisfaction of the County Planning Authority as advised by the Environment Agency.
Policy DM8 – Design, Local Landscape and Townscape Character	Development will be permitted if it will not harm the conservation of, or prevent the enhancement of, key characteristics of its surroundings with regard to the character of the landscape and townscape, including consideration of its historic character and settlement pattern, taking into account any appropriate mitigation measures.
Policy DM10 – Transport	Planning applications for new minerals and/or waste sites, or proposals that generate an increase in traffic movements or traffic impact, must be accompanied by a Transport Statement.
Policy DM12 – Amenity	The protection of amenity for people in close proximity to potential minerals extraction and associated developments and waste management facilities will be a key consideration. Where appropriate, buffer zones, advanced planting and/or screening and other mitigation measures, such as restriction on hours of working and dust suppression measures, will be required.

Policy Number	Policy Synopsis
Policy DM15 – Cumulative Impacts	Where a proposed mineral extraction site, or waste management facility, is considered acceptable (in its own right) but the cumulative impact of a proposal in conjunction with other existing, permitted or allocated minerals extraction sites and/or waste management facilities, in the proximity is considered unacceptable, the proposal may be considered acceptable if phased so that one site follows the completion of the other or it can be demonstrated that the adverse cumulative impacts can be adequately mitigated.

Emerging Minerals and Waste Local Plan

- 4.9 NCC are preparing a Norfolk Minerals and Waste Local Plan Review, to consolidate the three adopted DPDs into one Local Plan, ensure that the policies within them remain up-to-date and to extend the plan period to the end of 2036. The Draft Plan has been through extensive public engagement and was submitted to the Planning Inspectorate, on behalf of the Secretary of State, on 20 December 2023 for independent examination.

Table 4.3 Emerging Minerals and Waste Local Plan Policies

Policy Number	Policy Synopsis
Policy WP2 - Policy WP2: Spatial Strategy for waste management facilities – STRATEGIC POLICY	Water recycling centres can normally only be located on or adjacent to watercourses, so they are acceptable in such locations.
Policy WP14 – Water Recycling Centres	New or extended Water Recycling Centres, or improvements to existing sites and supporting infrastructure, will only be acceptable where such proposals aim to: <ul style="list-style-type: none"> a. treat a greater quantity of wastewater; and/or b. improve the quality of discharged water; and/or c. reduce the environmental impact of operation.

Policy Number	Policy Synopsis
	Proposals must also comply with the development management criteria set out in Policy MW1.

Broadland Joint Core Strategy DPD

- 4.10 The Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) was adopted in March 2011. It has been prepared by Broadland, Norwich and South Norfolk, working together with Norfolk County Council as the Greater Norwich Development Partnership (GNDP). The JCS sets out the long-term vision and objectives for the area, including strategic policies for steering and shaping development.
- 4.11 The policies of most relevance are in the table below.

Table 4.4 Relevant Local Plan Policies

Policy Number	Policy Synopsis
Policy 3: Energy and Water	The release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements arising from the new development and to ensure that water quality is protected or improved, with no significant detriment to areas of environmental importance. This will be achieved by greater efficiency and by providing infrastructure, including strategic interceptor sewers, to address environmental and capacity constraints at the strategic wastewater treatment works at Whitlingham and at local works. This water infrastructure will be upgraded as required and be operational in time to meet the demands of any development.
Policy 9: Strategy for growth in the Norwich Policy Area	The Norwich Policy Area (NPA) is the focus for major growth and development. Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle has been allocated 7,000 dwellings by 2026 continuing to grow to around 10,000 dwellings eventually.
Policy 10: Locations for major new or expanded	Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle This location will deliver an urban extension extending on both sides of the Northern Distributor Road.

Policy Number	Policy Synopsis
communities in the Norwich Policy Area	<p>The Site has been identified to deliver healthy, sustainable communities with locally distinctive design and high quality green infrastructure within the development and contributing to the surrounding network.</p> <p>This will include:</p> <ul style="list-style-type: none"> • At 7,000 dwellings (rising to 10,000 after 2026) • A district centre • New pre-school provision

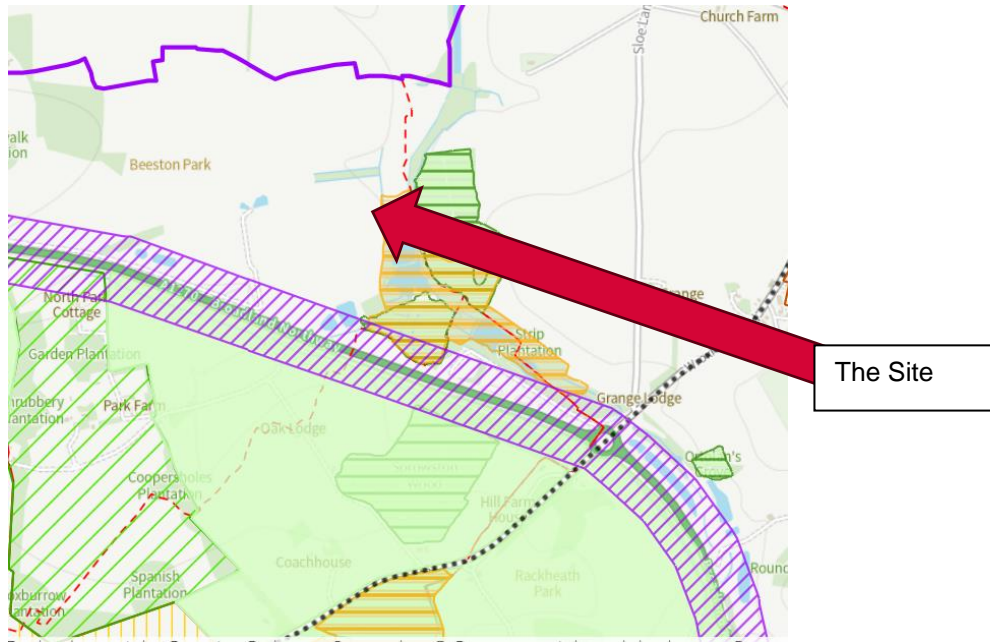
Development Management DPD

4.12 The Development Management DPD (DM DPD), adopted August 2015, aims to further the objectives set out in the National Planning Policy Framework (NPPF) and the Joint Core Strategy (Broadland, Norwich and South Norfolk). The Development Management DPD provides detailed local policies for the management of development.

4.13 The Site is relatively free from planning constraints. However, the southern portion of the Site is allocated for protection of land for transport improvements since the northern distributor route is located just south of the Site. There are a number of constraints in the locality of the Site these include:

- Country Wildlife Site (Ladies Wood, Church Charr & Springs)
- Ancient Woodland (Church Wood)

4.14 The policies map is shown below:



Source: Development Management DPD Policies Map (2014)

4.15 Key policies are summarised below:

Table 4.5 Development Management DPD Policies

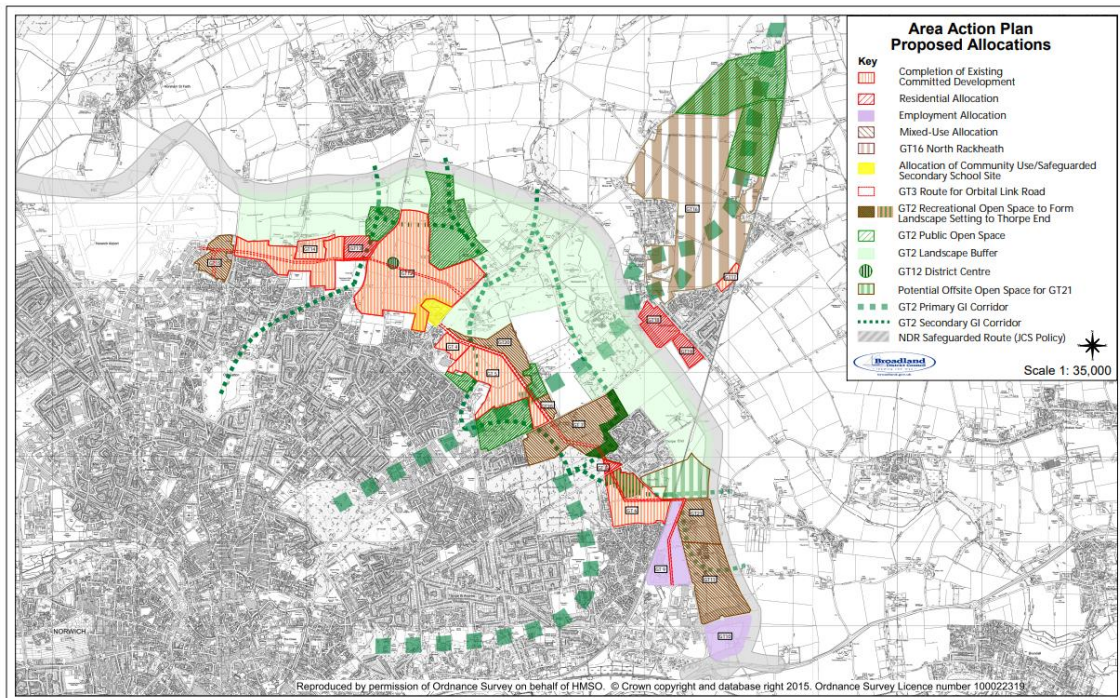
Policy Number	Policy Synopsis
GC4: Design	Development will be expected to achieve a high standard of design and avoid any significant detrimental impact.
Policy EN1: Biodiversity and Habitat	Planning proposals are expected to protect and enhance the biodiversity of the district.
EN2: Landscape	Development proposals should have regard to the local landscape character. Particular consideration should be given to protecting and enhancing the green spaces.
EN4: Pollution	Five of the units of the Broads are in unfavourable condition due to water quality, therefore ruling of the Dutch Case applies. All developments in the catchment have to demonstrate 'nutrient neutrality' in order to ensure no adverse effect on the integrity of the designated site, meaning that the nutrients generated by the development must be less than or equal to the nutrients generated by the existing land use.
TS1: Protection of land for	Land reserved for the improvement of the transport network will be safeguarded.

Policy Number	Policy Synopsis
transport improvements	
TS3: highway Safety	Development will not be permitted where it would result in any significant adverse highways impacts.
CSU5: Surface water drainage	<p>Mitigation measures to deal with surface water arising from proposals should be incorporated to minimise the risk of flooding on the development site without increasing flood risk elsewhere.</p> <p>Developers will be required to show the proposed development would not increase the vulnerability of the site or wider catchment and wherever practicable, have a positive impact on the risk of surface water flooding in the wider area.</p>

Growth Triangle Area Action Plan

- 4.16 The Area Action Plan (AAP) was adopted in July 2016 and was prepared to co-ordinate sustainable development at a strategic scale. While the Site has not been allocated in the AAP, the associated outline application (ref: 20161058) and subsequent RMA (ref: 20180708) are allocated for development in the AAP. Designations are detailed in the policies map below. It is important to note that the AAP pre-dates Nutrient Neutrality issues and therefore it would not have been known, at the that time, that a WwTW would be required to support the allocation coming forward.

Figure 5.1 – Local Plan Designations



Source: Policies Map (Area Action Plan, 2016)

4.17 Relevant policies are summarised below.

Table 4.6 Area Action Plan Policies

Policy Number	Policy Synopsis
Green infrastructure	Set out policy requirements to enable delivery of multi-functional green infrastructure corridors across the Growth Triangle. This green infrastructure must offset any recreational pressure on designated sites such as the broads.
GT 2: Green Infrastructure	An area will from the landscape setting to the future built edge of Norwich. Within this area, limited development will be permitted. This will be limited to extensions to existing buildings and/or development that would result in a significant community benefits.
GT12: North Sprowston & Old Catton	The Site has been allocated for mixed use development. No development will be permitted until a phasing plan has been approved. This will need to demonstrate how infrastructure and services are to be coordinated with development.

Policy Number	Policy Synopsis
GT14: Land East of Buxton Road	The Site of approximately 6.5ha is set to deliver residential development, cycle and pedestrian links with recreational areas.

The Greater Norwich Local Plan

- 4.28 As set out above, the GNLP is in the advanced stages of the adoption process. While technically adopted by Broadland District Council, the plan is undergoing a 6-week legal challenge period by whereby no final Local Plan document has been published. This period ends on 10 May 2024, when the adopted Local Plan will gain full weight going forward.
- 4.29 The Draft Plan identifies housing need of 45,041 dwellings from 2018-2038. The majority of homes are scheduled to be delivered in the Norwich Urban Area. The policies of relevance to this application are in the table below.

Table 4.7 GNLP Policies

Draft Policy Number	Policy Synopsis
Policy 1: The sustainable growth strategy	The key objective is sustainable growth to aid the delivery of a minimum of 45,041 new homes over the plan period. The settlement hierarchy is as follows: <ol style="list-style-type: none"> 1. Norwich urban area 2. Main towns. 3. Key service centres. 4. Village clusters
Policy 3: Environmental	Development proposals should enhance the natural environment through being designed to respect and retain natural assets, avoiding harm to designated and non-designated assets.

Draft Policy Number	Policy Synopsis
Protection and Enhancement	Within the catchments of the River Wensum Special Area of Conservation (SAC), The Broads SAC and the Broadland Ramsar development must provide evidence to enable the Local Planning Authority to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites in an unfavourable condition.

5. PLANNING ANALYSIS

- 5.1 This section reviews the key planning considerations arising from the Proposed Development. It provides a reasoned justification for the Proposed Development in the context of relevant policy and the specifics of the site and its surroundings.

Principle of Development

- 5.2 The proposed development is for a new WwTW which will be required to mitigate the nutrient output arising from the consented urban extension to the northeast of Norwich which is set to deliver a mixed-use urban extension for up to 3,520 Dwellings. The first RMA which was approved in September 2023 to deliver Phase One of Beeston Park which includes a package of strategic infrastructure and includes the purpose and details of this purpose built WwTW.
- 5.3 In the Broadland Rivers management catchment, Natural England have confirmed that developments that results in additional overnight accommodation could adversely affect the Broads, which is a Special Area of Conservation (SAC), comprising many different Sites of Special Scientific Interest (SSSI) and is designated under the Ramsar Convention under the name 'The Broadland'. In particular, development in this area may have an impact on the Bure Broads and Marshes SSSI. Recent water quality data shows that the Ant, Bure, Trinity, Upper Thurne, and Yare Broads and Marshes SSSIs are overall exceeding their water quality targets for nitrogen and phosphorus and are considered to be in 'unfavourable' condition. Therefore, the ruling of the Dutch Case applies.
- 5.4 In an EU ruling known as the 'Dutch Case' the European Court of Justice ruled that any additional release of nutrients into protected sites (Special Areas of Conservation (SAC); Special Protection Areas (SPAs); Ramsar sites (wetlands of international importance)) which are in an 'unfavourable' condition would be unlawful. Following the judgement and reliance on the Habitats Regulations (which were passed to implement the EU Habitats Directive into UK law) Natural England issued guidance to certain local authorities stating that planning permissions should not be granted unless a development can achieve 'nutrient neutrality'. In other words, the number of nitrates entering a water system needs to be offset by the removal of an equivalent number of nitrates.
- 5.5 Within this context, this proposal is being brought forward to provide a deliverable mitigation strategy to offset the nutrient load of the proposed residential development adjacent to the subject Site. As such the proposal should be seen favourably in seeking to overcome a significant issue halting the delivery of development in the area and enable the adjoining residential development to be brought forward to contribute to the Borough's housing needs. The principle of development has somewhat been supported by approval of the RMA (planning ref: 20180708) with the new WwTW being put forward as a mitigation solution within the Appropriate Assessment, approved by Natural England.

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- 5.6 The key policy for determining a new WwTW is CS11 of the Core Strategy and Minerals and Waste Management Policies Development Plan. This policy sets that WwTW will be acceptable where the proposal seeks to improve the quality of discharged water. Proposals will be required to demonstrate that the proposal can be located and operated without giving rise to unacceptable environmental, amenity and highways impacts. This section of the Planning Statement demonstrates that the proposal is acceptable from a highways perspective and sits wholly in accordance with Policy CS11.

Ecology and Biodiversity

- 5.7 Conservation and enhancing the natural environment are core principles of the NPPF as explained by Paragraph 8 (an environmental objective) and Paragraph 11 (the presumption in favour of sustainable development). Section Paragraph 180 of the NPPF supports opportunities that contribute to and enhance the natural and local environment such as sites of biodiversity.
- 5.8 Policy CS14 of the Minerals and Waste DPD Plan determines that the protection and enhancement of Norfolk's natural and built environments is a vital consideration for future waste management facilities and developments must ensure that there are no unacceptable adverse impacts on the local environment.
- 5.9 Adopted policy EN1 required proposals to protect and enhance the biodiversity of the District. It goes on to state that where harmful impacts may occur, adequate mitigation is incorporated including specific mitigation requirements to address impacts on international wildlife sites.
- 5.10 Draft policy 3 sets out that within the catchments of the River Wensum Special Area of Conservation (SAC), The Broads SAC and the Broadland Ramsar development must provide evidence to enable the Local Planning Authority to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites in an unfavourable condition.
- 5.11 An Ecology report has been prepared by Hopkins Ecology and has been submitted alongside this application. The report concludes that the Site is of very low ecological value in terms of its habitats. The species that have been identified of value at a local scale include foraging bats and nesting birds which are identified in low numbers. The Ecology report suggests suitable mitigation measures to protect the above species.
- 5.12 Hopkins Ecology has also prepared a Biodiversity Net Gain metrics which have been submitted alongside this application. The BNG metrics conclude that the scheme achieves a Biodiversity Net Gain of +130% driven by the low baseline and extensive high-quality landscaping. Overall, it is considered that the residual impacts of the scheme are considered to be positive based on the substantial increase in non-arable vegetation.

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- 5.13 The delivery of the proposed WwTW will deliver biodiversity improvements through habitat creation and enhancement that will benefit the Site and the wider catchment area. The scheme is fundamental to mitigating against harmful impacts on the Broadland SAC and ensuring the recently consented development will not affect the integrity of the unfavourable condition of water quality in this locale. The scheme fully accords with Broadlands policy objectives concerning biodiversity.

Landscape Strategy

- 5.14 Paragraph 174 of the NPPF supports opportunities that contribute to and enhance the natural and local environment such as valued landscapes.
- 5.15 Policy DM 8 of the Minerals and Waste Core Strategy sets out that development will be permitted if it will not harm the conservation of, or prevent the enhancement of, key characteristics of its surroundings with regard to the character of the landscape.
- 5.16 Adopted local policy EN2 determined that development proposals should have regard to the local landscape character. Particular consideration should be given to protecting and enhancing the green spaces. The Council's Landscape Character Assessment SPD provides additional guidance in respect of appraising landscape and visual impacts.
- 5.17 A Landscape Plan has been prepared by Aspect and demonstrates that the proposal is landscape led. The existing field boundaries have been retained and enhanced with additional native shrub planting. There is extensive planting proposed along the Site boundaries. This will ensure that the proposal will blend in with the natural surroundings and will assimilate seamlessly with the existing landscape.
- 5.18 As such the proposal is considered to be in adherence with local and national policy requirements in regard to landscape and visual impact.

Arboriculture

- 5.19 Paragraph 174 of the NPPF highlights the importance of recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. Paragraph 180 goes on to states that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists.
- 5.20 The proposal does not involve the loss of trees and as such the proposal is considered to be in adherence with local and national policy requirements in regard to arboricultural impact.

Archaeology

- 5.21 An Archaeological Desk-Based Assessment has been prepared by Wessex Archaeology. The assessment investigates the known and potential archaeological resource within the site and surrounding area to assess the likely impacts of the development.
- 5.22 The Archaeology Assessment has established that there is an archaeological interest within the Site. This is based on the potential for the presence of buried archaeological remains relating to the prehistoric period.
- 5.23 The Assessment concludes that there are no overriding archaeological constraints which are likely to prohibit development.

Flood Risk and Drainage

- 5.24 Policy DM3 of the Minerals and Waste Core Strategy requires applicants demonstrate that proposed developments would not adversely impact upon groundwater quality or resources and surface water quality or resources.
- 5.25 Local Plan Policy CSU5 seek proposals to contribute to overall flood risk reduction and that adequate supply and treatment are provided to ensure development does not negatively impact on water quality. Policy seeks to ensure all developments include sustainable drainage systems for the disposal of surface water.
- 5.26 The accompanying Flood Risk Assessment explains that the proposed WwTW development is classified as 'water compatible'; therefore, the proposal would be suitable for any flood zone classification. The FRA concludes that the proposed development is safe from flooding sources and there are no receptors that could be vulnerable to increased flood risk within proximity of the Site.

Noise and Odour

- 5.27 Policy DM12 of the Minerals and Waste Core Strategy requires development to protect the amenity for people in close proximity. Where appropriate, buffer zones, advanced planting and/or screening and other mitigation measures, such as restriction on hours of working and dust suppression measures, will be required.
- 5.28 An Odour Assessment has been prepared by Entran and has been submitted alongside this application in order to understand the odour associated with the emissions arising from the proposed plant. The Assessment concludes that the concentration of odour at the nearby sensitive receptors is predicted to be below the relevant benchmark, an assessment following the IAQM guidance has

shown the impact is determined to be insignificant. It is therefore considered that odour is not a constraint to this proposal.

5.29 A Noise Assessment has also been prepared by Entran and has been submitted alongside this application. At this stage, the exact specification of the proposed WWTW has not yet been finalised and therefore the Noise Assessment has sought to identify noise limits that align with relevant national standards and guidelines. Unattended sound measurements were undertaken to obtain sound levels representative of the existing environment and it is concluded that the WwTW will fall below the identified background sounds at the nearby receptors. Mitigation measure will be put in place to ensure that the WwTW remains below these levels.

5.30 Evidentially, the proposal will not result in an unacceptable level of noise or odour and as a result will protect the amenity of local residents in accordance with policy DM12.

6. PLANNING BALANCE AND CONCLUSION

- 6.1 This planning application has been prepared on behalf of Stretton Beeston for a WwTW at Beeston Park, Norwich. The proposal is for a WwtW development to help mitigate the nutrient output arising from the consented urban extension to the northeast of Norwich which is set to deliver up to 3,520 Dwellings (planning ref: 20161058). The first RMA was recently approved for the Phase One Strategic Infrastructure (planning ref: 20180708) and included a phased mitigation strategy to achieve nutrient neutrality; including this purpose-built WwTW
- 6.2 The principle for of development of a purpose-built WwTW has been approved by determination of the RMA (planning ref: 20180708). As set out in the NNAMS, this development is fundamentally necessary to allow for the Broadland SAC application to be approved and delivered without delay.
- 6.3 As the preceding planning analysis demonstrates, the scheme accords with regional, local and national policy, whilst providing numerous economic, social and environmental benefits that weigh in support of the scheme being granted planning permission. Therefore, the proposals should be approved without delay in accordance with Paragraph 11(c) of the NPPF.
- 6.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.5 A comprehensive assessment of the proposed development against the development plan policies has been undertaken. It is apparent that there are no technical constraints or barriers that would prevent the development from coming forward, and that the proposed development accords with National and Local Planning Policy. Accordingly, planning permission is sought for the proposal.