

Our Ref: 3418-01/S

06 March 2024

Norfolk County Council,
County Hall,
Martineau Lane,
Norwich,
Norfolk,
NR1 2DH

Dear Sir / Madam,

SECTION 73A APPLICATION FOR RETROSPECTIVE PLANNING PERMISSION FOR SITE OFFICE BUILDING AND AREA OF HARDSTANDING AT COSTESSEY WASTE TRANSFER STATION AND MATERIAL RECOVERY FACILITY, LONGWATER INDUSTRIAL ESTATE, COSTESSEY, NORWICH, NORFOLK NR5 0TL.

Introduction

On behalf of our client, FCC Environment (UK) Limited (FCC), we write in relation to an application which has been submitted under section 73A of the Town and Country Planning Act 1990. The application seeks retrospective planning permission for a site office and area of hardstanding (the Development) to the north of the Costessey Waste Transfer Station (WTS) and Materials Recovery Facility (MRF). The planning application has been submitted electronically via the Planning Portal (Ref: PP-12009742) and comprises:

- i. This Cover Letter;
- ii. Planning Application Form and Certificate;
- iii. Planning Application Figures and Drawings:
 - o Site Location Plan (Figure 1);
 - o Site Office Photographs (Figure 2);
 - o Statutory Plan (3418-01-01);
 - o General Arrangement (3418-01-02);
 - o Existing Elevations (3418-01-03); and
- iv. The fee of £357.

Site Description

The Application Site (the Site) is located within a 30sqm area of hardstanding to the north of the WTS & MRF as seen in Figure 1. The WTS & MRF site is approximately 2.6 hectares and is located on the Longwater Industrial Estate to the south west of Costessey. The Site is accessed via Ernest Gage Avenue and William Frost Way, approximately 500 metres from the Longwater interchange on the A47(T).

To the south and west of the Site is industrial land which forms part of the Longwater Industrial Estate. The land immediately north of the Site also forms part of the industrial estate, beyond which is a narrow woodland, and this separates the northeastern extent of the Longwater Industrial Estate from the

industrial land surrounding the Site. To the east of the Site is a large woodland, beyond which is Costessy Park Golf Club.

The Site is approximately 7km west of the centre of Norwich, the nearest residential property is approximately 620m to the south of the Site on Prince Close.

Description of Development

The Development consists of a 6.1m x 3.7m olive green modular office and a 30sqm area of hardstanding. The office is 2.5m in height. This office is situated near the WTS site's northern boundary, seen in Figure 1 and occupies approximately 22.57sqm floorspace. Photographs of the office can be seen on Figure 2. The area was previously occupied by a welfare block, mess room and toilets. Details of the site office can be seen on Planning Drawings 3418-01-02 and 3418-01-03. Figure 2 provides photographs of the Development.

This site office is constructed on a new concrete pad (area of hardstanding) and provides office facilities for staff and visitors. This application seeks retrospective permission for both the Site office and the concrete pad.

The office is accessed in the same way as the previous uses that were in this location. The office is connected to the existing drainage system at the Site.

Planning Context

Given the scale and nature of the development, the planning policy considerations are narrow.

The Site is allocated within the Norfolk Minerals and Waste Development Framework: Waste Site Specific Allocations Development Plan Document, identifying the Site Land at Costessey Transfer Station, Longwater Business Park, Costessey Policy (WAS 31). Policy WAS 31 confirms that development will be subject to compliance with adopted Core Strategy and development management policies and will require any planning application to address a number of requirements, including:

- Design and landscaping to address visual impact on the Tud valley and on views from the north;
- Protection of amenity by mitigation and control of noise, dust, odour and lighting;
- Appropriate site design, engineering and operations - including the containment of waste management operations which could cause emissions to air within a building, impermeable site surfacing and a sealed drainage system - to ensure no adverse effects on the integrity of the River Wensum SAC and other protected habitats in the vicinity of the site, particularly from water run-off and emissions to air.

The Site is 1km from the River Wensum Special Areas of Conservation (SAC) and Site of Special Scientific Interest (SSSI), the scale and nature of the development and site location means that there will be no impact on these sites.

The site office is prefabricated, with a scale in-keeping with the other buildings on Site. There would be no additional operations at the Site which could give rise to additional pollution or amenity concerns.

Sustainability Statement

A Sustainability Statement is required under Norfolk County Council's National and Local Validation Requirements for Minerals and Waste Planning Applications June 2023 (the 'Validation List') for all applications for major development. Whilst the development is very minor in nature, with a footprint of approximately 27m², the development relates to waste and as such, the proposal falls within the major development category. However, this Sustainability Statement is proportionate to the scale of the development proposed.

As per the Validation List, the statement should include a sustainability appraisal outlining the elements of the Proposed Development which addresses sustainable development issues and details of how sustainable design and construction have been addressed.

The welfare building is necessary to assist in the operation of the Site, which is both a WTS and an MRF, and as such the Proposed Development contributes to the reduction of waste disposal. The Proposed Development increases the overall functionality of the Site and therefore the proposal contributes to driving waste up the Waste Hierarchy and subsequently, this reduces the amount of waste being directed to landfill. Therefore, the Proposed Development represents sustainable development and is supported by the National Planning Policy for Waste (NPPW).

Promoting sustainability and sourcing responsibly are two fundamental principles of FCC's Carbon and Sustainability Policy and these are achievable through the effective procurement of materials. This is reflected in the Proposed Development, as the welfare building was relocated from an existing FCC site and therefore, this reduced the number of materials required to construct the Proposed Development, as well as the environmental impact of constructing the Proposed Development itself. In addition, the welfare building is of a modular design and due to delivery and erection methods, modular design typically represents a more environmentally sound solution with less embedded carbon when compared to traditional build methods. Therefore, the Proposed Development minimises pollution and maximises the use of sustainable materials, as per the Validation List.

FCC is committed to improving their carbon management and this is reflected in the innovative and sustainable solutions to waste management. FCC will always look to incorporate sustainable initiatives into their developments, however, given the scale and nature of the Proposed Development, there are limited opportunities for the addition of renewable energy technologies onsite, for example, there is limited available roof space to support photovoltaic panels due to existing infrastructure.

This section of the covering letter has demonstrated how the choice of building design and materials has reduced the overall carbon footprint of the Proposed Development and minimised the pollution attributable to its delivery and construction. The Proposed Development itself is necessary to maintain functionality at the Site and as such, this statement has also demonstrated that the Proposed Development constitutes sustainable development, as it contributes to driving waste up the Waste Hierarchy.

Summary and Conclusions

This application for retrospective planning consent has been submitted to Norfolk County Council by FCC for permission for a site office at Costessey WTS, Longwater Industrial Estate, Costessey.

The Development is on a site with pre-established waste use and would have no impacts on the surrounding environment. It is therefore recommended that retrospective planning permission for the development be granted.

We trust that the content of this letter and the application documentation are self-explanatory. However, please do not hesitate to contact the undersigned at our Chester Office should you have any queries or require any further information.

Yours sincerely,



Siân Hayle
Associate