

Chris Raine
Broadland District Council
Development Control
Thorpe Lodge (1) Yarmouth Road
Norwich
Norfolk
NR7 0DU

Our ref: AE/2021/126706/04-L01
Your ref: 20212061
Date: 06 September 2024

Dear Chris

OUTLINE PLANNING APPLICATION FOR UP TO 150 DWELLINGS (UP TO 12,000SQ.M)(USE CLASS C3) INCLUDING DWELLINGS CLASSIFIED AS AFFORDABLE HOUSING, OPEN SPACE PROVISION, ACCESS, INTERNAL ESTATE ROADS, PATHS, VEHICLE AND CYCLE PARKING, DRAINAGE, HIGHWAYS WORKS AND ALL ASSOCIATED WORKS AND OPERATIONS INCLUDING BUT NOT LIMITED TO DEMOLITION, EARTHWORKS, AND ENGINEERING OPERATIONS, WITH THE DETAILS OF APPEARANCE, LANDSCAPING, LAYOUT, AND SCALE RESERVED FOR LATER DETERMINATION

LAND AT GRIFFIN LANE,YARMOUTH ROAD,THORPE ST ANDREW

Thank you for your re-consultation dated 23 August 2024. We have reviewed the submitted Flood Compensation Plan, referenced 191302 – C-010 – Revision P01 and dated 20 August 2024, and do not consider it to adequately address the issues raised in our letter dated 25 July 2024. We are therefore maintaining our objection on flood risk grounds. We have set out our position below, as well as detailing how the applicant can overcome our objection.

In the absence of a foul water strategy, we are also maintaining the water quality objection raised in our previous letter. We have repeated that objection below.

Flood Risk

We have reviewed the submitted Flood Compensation Plan and do not consider it acceptable on either a volume-for-volume and level-for-level basis. The existing levels

table and proposed levels table do not provide sufficient information for a flood compensation plan. Please see the following points for more detail:

1. The flood compensation plan does not provide volumes (m^3) for each elevation slice. It currently only provides the area (m^2) of each elevation slice.
2. The flood compensation plan does not provide a comparison of the areas (m^2) / volumes (m^3) for each elevation slice.
3. We have calculated the total area of the existing levels from the elevation table as $6464.15m^2$ and the total area of the proposed levels from the elevation table as $6217.2m^2$. This indicates a loss of $246.94m^2$ area in the proposed compensation scheme. A loss of area indicates a loss of flood storage volume with the current proposed flood compensation plan, which is not acceptable as it is failing to provide compensation on a volume-for-volume basis.
4. We have compared the area provided at each level slice and have noted that compensatory storage is not provided at the elevation slices where it is lost, which is not acceptable as it is failing to provide compensation on a level-for-level basis. Specifically, we note that roughly $3000m^2$ of the proposed compensation area is proposed between elevations 0.00m AOD and 0.70m AOD, whereas there is no existing area on the site between these elevations.

Overcoming our Objection

- Provide an updated flood compensatory storage plan that provides compensation on a volume-for-volume and level-for-level basis to prevent a loss of floodplain storage in the 1% (1 in 100) annual probability flood extent, including allowances for climate change.
- The table that accompanies the updated flood compensatory storage plan should detail the volumes of flood water from the 1% (1 in 100) annual probability flood extent, including allowances for climate change at each elevation slice for the existing site levels and the proposed site levels. The table should then compare the volumes at each level slice as well as the total volumes. The table in an updated compensatory storage plan will need to show that the proposed compensatory storage scheme does not result in a loss of flood storage volumes either at each elevation level slice or in total volumes. Further guidance on the provision of compensatory flood storage is provided in section A3.3.10 of the CIRIA document C624.

Other Sources of Flooding

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.

Water Quality

The proposed development site is located within the catchment of the Whitlingham Trowse Waste Water Treatment Works (WWTW), which serves the majority of the Norwich urban area and immediate surrounding catchment.

Although Anglian Water Services have correctly identified that the WWTW has not exceeded the parameters set for enforcement action, it is currently exceeding the limits set for its environmental permit to discharge treated flows to a surface waterbody which in this case is the River Yare. This difference is because enforcement triggers are set at a greater volume than the environmental permit to account for fluctuations such as weather events. The environmental permit limit is set to prevent harm to the waterbody into which the treated flows discharge and so exceedance of this may cause deterioration. There are also other challenges at this WWTW, which although being adequately managed at present could be exacerbated by increased foul water flows from new development being connected to the sewerage network before planned improvements and processes are in place - especially if this occurs in a similar timeframe to other consented developments.

There is significant growth proposed in the catchment of this WWTW with submitted planning applications equivalent to several thousand dwellings. We note that there has been little discussion in the submitted documents of the impact of growth on the WWTW or on the waterbody. The Environmental Statement Addendum Volume 1 (May 2024) paragraph 10.4.14 correctly identifies water industry sewage discharge amongst the reasons for not achieving good status, but there is no further discussion on how the proposed development may affect this. We note that Anglian Water Services plan to make the WWTW capable of treating flows to the Technically Achievable Limits (TAL) by 2027 to meet the requirements set out in the Levelling Up and Regeneration Act, which supports mitigation for nutrient neutrality issues. We also note that in the Anglian Water Services (AWS) Drainage and Wastewater Management Plan (DWMP), Whitlingham WWTW is identified for upgrades to the networks to increase capacity by 2035, with a number of longer-term measures also proposed. However, it is not yet clear what impact these measures will have on the volume of discharge that will be permitted and hence the number of new dwellings that can be connected without causing exceedance, nor the timings of the works and how they fit with the construction and occupation of development proposals.

For these reasons we consider that the Applicant has not provided sufficient information to assure the Local Planning Authority that if consented, this development will not cause unacceptable harm to the environment specifically the river Yare.

Overcoming our objection

We recommend that the Applicant, in consultation with AWS, shall submit a foul water strategy that:

- Includes analysis of forecasted flows arising from the site when operational with data records for the current measured capacity of the receiving WWTW to demonstrate that the flows can be treated whilst remaining compliant with current or new environmental permits.
- Includes an assessment of the cumulative impacts on foul water treatment and water quality for this WWTW catchment
- Includes plans for appropriate phasing of development to ensure that it becomes operational in line with available capacity and not before

Submission of a foul water strategy which addresses the above concerns will not in itself overcome our objection. We will provide bespoke comments upon receipt of re-consultation. Depending on the evidence submitted and circumstances at the time we reserve the right to reconsider our position. Should the LPA be minded to approve this

application, contrary to our advice, we request that they contact us to discuss further prior to any decision being made.

We trust this advice is useful.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AH' or 'Alasdair Hain-Cole' in a stylized, cursive script.

Mr Alasdair Hain-Cole
Planning Officer

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