



St Edmundsbury
BOROUGH COUNCIL

DEV/SE/19/014

Development Control Committee 7 February 2019

Planning Application DC/18/2013/FUL – Water Pumping Station Corner of A143, Haverhill Road, Little Wrating

Date Registered: 09.10.2018 **Expiry Date:** 08.02.2019

Case Officer: Julie Barrow **Recommendation:** Approve Application

Parish: Little Wrating **Ward:** Withersfield

Proposal: Planning Application - New water treatment works

Site: Water Pumping Station Corner of A143, Haverhill Road, , Little Wrating

Applicant: Miss Angela Richardson - Anglian Water Services Ltd

Synopsis:

Application under the Town and Country Planning Act 1990 and the (Listed Building and Conservation Areas) Act 1990 and Associated matters.

Recommendation:

It is recommended that the Committee determine the attached application and associated matters.

CONTACT CASE OFFICER:

Julie Barrow

Email: julie.barrow@westsuffolk.gov.uk

Telephone: 01284 757621

Background:

Prior to the submission of the application the applicant requested a Screening Opinion from the Local Planning Authority. The LPA determined that the proposal does not constitute environmental impact assessment development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The application is referred to Development Control Committee as it relates to a major planning application and Kedington Parish Council objects to the proposal. The site is located in the Parish of Little Wratting, however given its proximity to Kedington, Kedington Parish Council were consulted and objected to the application.

A site visit will take place on 31 January 2019.

Proposal:

1. The application seeks consent for the construction of a water treatment works on land to the south-west of the B1061 / A143 junction. The works will occupy a footprint of approximately 7200m² and will comprise the following components:
 - Settlement tanks
 - Surge vessel
 - Balance tanks
 - Filter plat
 - Switchroom kiosk
 - Hypochloride dosing kiosk
 - Orthophosphoric dosing kiosk
 - Sampling kiosk
 - Switch room kiosk
 - Pump building
 - Sampling kiosk
 - Stand-by generator and fuel tank building
 - Welfare building
 - DN0 metering kiosk
 - Hundon pumping station
2. The various components of the water treatment works will vary in size and height with the filtration plant being the tallest structure with a maximum height of 7.8m. The adjacent settlement tanks will have a maximum height of 5.9m. The equipment is located towards the centre of the site, where the ground level will be reduced to approximately 3-4m below the level of the ground to the west of the site.
3. With the exception of the access off the B1061 Haverhill Road, the treatment works will be surround by an earth bund approximately 2.5m high. The site will be enclosed by 3.9m high steel security fencing (painted green) with space provided for landscaping.
4. A pump station kiosk and a metering kiosk will be installed adjacent to an existing borehole immediately to the north of the site of the proposed treatment works. Land to the west of the borehole will be used during the construction process as a temporary compound and soil storage area.

5. The proposed water treatment works will treat water from the existing abstraction borehole located adjacent to the works. The new process will pump water from the borehole through filtration and disinfection processes.
6. A new pipeline is also proposed to support the water treatment works. This does not form part of this application as Anglian Water has established that the installation of the pipeline can be carried out as permitted development and an express planning permission is not therefore required.

Application Supporting Material:

7. The following supporting documents have been submitted with the application:
 - Planning & Design & Access Statement
 - Site Location Plan
 - Site Layout Plan
 - Plans detailing:
 - Elevations
 - Fences details
 - Visibility splays & road details
 - Temporary ditch crossing
 - Bund details
 - Filter plant
 - Dirty wash water tanks
 - Contact & balance tanks
 - Hypochloride, Orthodosing kiosk
 - Generator & fuel tank building, welfare building and waste tank
 - Switch room kiosk
 - Standby generator building
 - Welfare building
 - DNO & Hundon kiosk
 - Landscaping
 - Landscape Management Plan
 - Ecological Appraisal Report
 - Noise Assessment
 - Archaeological Brief
 - Archaeological Written Scheme of Investigation
 - Transport Statement
 - Traffic Management Plan
 - Landscape Visual Impact Assessment
 - Cover letter to landowner
 - Development Notice
 - Resident Consultation Letters
 - Parish Council Consultation
8. During the course of the application site drainage details were submitted together with the information requested by the Environment Agency at EIA screening stage.

Site Details:

9. The site is located to the south-west of the B1061 / A143 junction and is currently in agricultural use. An existing borehole lies to the north of the site. The site is bounded on its northern side by a ditch and a single track

access road that serve the borehole site then leads onto farmland. Agricultural land surrounds the site to its south and west. The land opposite the site is in industrial use (albeit that the premises are currently not being used by the landowners), with a sports field and residential development further south. There are a number of dwellings to the north-west of the site known as Green Row, with The Folly immediately to the west of this cluster of dwellings on the old Haverhill road.

Planning History:

10.Reference	Proposal	Status	Decision Date
DC/18/1706/EIASC R	EIA Screening Opinion under Regulation 5 (1) of the Environmental Impact Assessment Regulations 2011 on the matter of whether or not the proposed development is considered that there are likely significant environmental impacts for which an Environmental Statement would be required - Construction of a new water treatment works at Kedington and construction of two c2.4 km parallel water mains between the new works at Kedington and Boyton Hall Water Reservoir	ES required	not 15.10.2018

Consultations:

11. SCC Highways – No objection subject to conditions.
12. SCC Strategic Development – Travel Plan Officer – No comment. Development is too small to justify a Travel Plan.
13. Public Health & Housing – The closest residential premises are approximately 100m away. All the plant will generate noise, which may impact on the residential occupiers within the vicinity of the site.

The application is supported by a Noise Assessment Report. Baseline sample noise measurements were undertaken and noise levels due to various noise sources at the treatment plant were calculated at noise sensitive premises. The calculations were based on all plant operating simultaneously, as a worse-case scenario. The standby generator is tested for 2 hours during the daytime on a monthly basis and will only operate in the event of a power cut.

The report concludes that, excluding the operation of the standby generator, the remaining plant items would generate noise levels that should result in

daytime, evening and night-time noise levels that are below the WHO guidelines with windows open.

There is an adverse impact at The Folly and Green Row properties during the evening with the rating level 1db above background level but this is not considered to be significant. During the night-time the rating level is 4db above background noise level, which, whilst this impact is approaching adverse but significant, it may give rise to some lack of amenity.

With the standby generator in operation, whilst the calculated rating level would indicate a low impact at the nearest residential property during the daytime, the rating level during the evening and night-time will be 6db and 9db respectively above the background noise levels at The Folly and Green Row and 1db and 2db above the background levels at Stone Cottage, at around 150m to the south of the site. The operation of the plant, with the generator in operation, during the night-time, may therefore give rise to some lack of amenity but the internal noise levels, with windows open, will still be below the recommended WHO guideline values.

Whilst Public Health & Housing would not wish to raise any objections to this application, due to the low background noise levels at the nearest residential properties to the application site, particularly during the night-time, the operation of the plant may give rise to some lack of amenity.

Conditions recommended to minimise the impact of the development during construction on the existing residential occupiers in the vicinity of the site.

14. Cadent – There is apparatus in the vicinity of the site that may be affected by the activities specified – High or Intermediate pressure (above 2 bar) Gas pipelines and associated equipment. Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.
15. SCC Archaeological Service – There would be no significant impact on known archaeological sites or areas with archaeological potential. No objection to development and no archaeological mitigation is required.
16. SCC Floods – As the proposed site area (non-residential development) is less than 41ha the LLFA has no formal comments to make.
17. Historic England – Do not wish to offer any comments. Suggest that the views of the Council's specialist conservation advisers are sought.
18. Environment Agency – The EA has no concerns over the proposal for this water treatment works.

The EA do not consider there to be any issues with changes in flow regime because the groundwater is at significant depth below surface. The abstraction borehole is solid cased to a depth of 62m and abstracts from the Chalk. The Chalk underlies a substantial thickness of boulder clay approx. 45m thick. The Chalk is confined at this location and the groundwater level is believed to be in the region of 17mbgl, so it is highly unlikely that the flow path will be disrupted.

The applicant should incorporate appropriate pollution control measures.

Anglian Water Services have already contacted the EA about a discharge permit.

Representations:

19. Cllr J Midwood – *I have contacted residents in Little Wrattling (there is no Parish Council) and I have not found objections to the proposals.*

Great Wrattling Parish Council discussed the plans at their meeting last month and found no grounds to object.

The only opposition to the plans I have received was from a Kedington resident who urged me to call in the application to Committee. I am not prepared to do this as I do not represent Kedington Ward.

20. Kedington Parish Council – Objects to the proposal on the following grounds:
- The site is on Greenfield land outside the settlement boundary of Kedington which is countryside, protected from development.
 - The visual amenity of this prominent gateway to the village will be adversely affected.
 - It would be detrimental to maintaining the identity, character and historical context of our settlement, contrary to Policy CS4 and significant detrimental impact, contrary to DM5.
 - The alternative site assessment has not adequately explored available brownfield sites as required by the sequential approach, Rural Vision 2031 Policy CS1.
 - The alternative site assessment has not adequately explored all available sites which are in less-prominent positions with a better fit in the landscape which would have less impact upon the landscape and visual amenity.
21. Site notice posted, advertisement placed in the East Anglian Daily Times and 9 nearby addresses notified. Responses received from Bell House, Silver Street, Kedington objecting to the proposal, which are summarised as follows:
- Do not believe Kedington Parish Council has been notified of the application and there is now little time to respond.
 - Understand need for current borehole at proposed site was to provide standby support until completion of additional control measures at Great Wrattling WTW.
 - Relevant to understand relationship between facilities and what targeted regulatory mechanisms have been put in place to ensure that non-metaldehyde slug-control techniques are used in high risk areas.
 - Alternative site assessment does very little to evaluate all available alternative sites.
 - Rural Vision 2031 Policy CS1 states that the sequential approach dictates that brownfield sites should be considered before making any greenfield allocations. There is plenty suitable brownfield land available in the direct vicinity of the proposed location.
 - There is a presumption against further development in the countryside.

- Proposal threatens the identity, character and historical context of Kedington.
- Visual amenity will be adversely affected.
- The additional site assessment sought one large rectangular site. The application is for 2 sites which will be very difficult to assimilate into the surroundings.
- The proposed application sites sit directly in the path of a "proposed local link", which formed St Edmundsbury Green Infrastructure Strategy.
- The Visual Assessment did not show the quality of the landscape and the analysis failed to understand the importance of this value to the village of Kedington.
- The open landscape between Kedington and Haverhill is an important feature to prevent coalescence and has a high importance, locally.
- The application does not contain sufficient information on the need, distinguish between functions that it may be expected to fulfil or clarify the timescale that the site would be re-instated back to its original form.
- Is this site for drinking water purification or for waste water treatment?
- Kedington already has a waste water treatment site.

The responses can be read in full online.

Policy:

22. The following policies of the Joint Development Management Policies Document, the St Edmundsbury Core Strategy 2010 & Vision 2031 Documents have been taken into account in the consideration of this application:

- Core Strategy Policy CS2 - Sustainable Development
- Core Strategy Policy CS3 - Design and Local Distinctiveness
- Core Strategy Policy CS13 - Rural Areas
- Vision Policy RV1 - Presumption in favour of Sustainable Development
- Policy DM1 Presumption in Favour of Sustainable Development
- Policy DM2 Creating Places Development Principles and Local Distinctiveness
- Policy DM5 Development in the Countryside
- Policy DM6 Flooding and Sustainable Drainage
- Policy DM11 Protected Species
- Policy DM12 Mitigation, Enhancement, Management and Monitoring of Biodiversity
- Policy DM13 Landscape Features
- Policy DM14 Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards
- Policy DM20 Archaeology
- Policy DM44 Rights of Way

Other Planning Policy:

23. National Planning Policy Framework (2018)

Other Relevant Planning Policy and Guidance:

24. The National Planning Policy Framework was revised in July 2018 and is a material consideration in decision making from the days of its publication. Paragraph 213 is clear that existing policies should not be considered out of date simply because they were adopted or made prior to the publication of the revised NPPF. Due weight should be given to them according to their degree of consistency with the Framework; the closer the policies in the plan to the policies in the Framework, the greater weight that may be given. The Policies set out within the Joint Development Management Policies have been assessed in detail and are considered sufficiently aligned with the provisions of the 2018 NPPF that full weight can be attached to them in the decision making process.

Officer Comment:

25. The issues to be considered in the determination of the application are:
- Principle of Development
 - Impact on the character and appearance of the area
 - Highway safety
 - Ground conditions and contamination
 - Residential amenity
 - Other planning matters

Principle of development

26. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. The St Edmundsbury Development Plan is comprised of the adopted Core Strategy, Vision 2031 (consisting of three Local Plans – Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031) and the Joint Development Management Policies. National planning policies set out in the Framework are a key material consideration.
27. Policy CS1 makes reference to the fact that all growth around Bury St Edmunds and Haverhill will protect the identity of those villages that surround the towns and strategic landscaped buffers will be identified and where necessary used to ensure that the settlements do not become part of the larger urban area. A local resident takes the view that the proposed development is contrary to this policy given that the application site lies on land between Kedington and the land designated for development at Haverhill. The application site occupies a very small area in the context of the land between Kedington and Haverhill. The water treatment works is not being considered as an extension to the proposed development at Haverhill and lies quite separate from that development. The construction of a water treatment works in this area will not, on its own, result in the significant urbanisation of the immediate locality and as such is not considered to be contrary to this element of Policy CS1.
28. Policy CS2 relates to sustainable development and emphasises the need to protect and enhance natural resources. As discussed below, the proposed

development will have an adverse impact on the character and appearance of the immediate area and this will need to be balanced with the need for the development. Policy CS2 also makes reference to the fact that when considering the sustainable design of the built environment it is necessary to provide the infrastructure and services required to serve development.

29. Anglian Water's Planning Statement explains that as a result of many years of agricultural use within the ground water catchment supply area, low level concentrations of pesticides are building up in local ground water sources. Although these levels are not significant, the Drinking Water Inspectorate is encouraging work to be undertaken to maintain drinking water quality standards over the long term.
30. Currently, drinking water in the area is supplied by Great Wratting Water Treatment Works and stored at Boyton Hall Reservoir ready for supply. As part of the programme of improvement works being carried out by Anglian Water, this proposed water treatment works will be located adjacent to the existing water abstraction borehole at Kedington. A pumping station, housed in a small kiosk is also required at the existing borehole site and this has already been constructed under permitted development rights.
31. The separate pipe laying project referred to above will include the construction of two c2.4km parallel water mains between the new works at Kedington and Boyton Hall Water Reservoir. The mains are required for the blending and distribution of treated water from Boyton Hall Reservoir, which will feed into the Haverhill and Hundon areas.
32. The project will improve water quality for over 30,000 people in Haverhill. By providing an independent source of potable water it will provide additional resilience to the network. The overall solution using outputs from both Kedington and Great Wratting works will make sustainable use of the local water sources, and ensure current and future supply demands are met.
33. Anglian Water has been asked whether the development is directly connected to the large scale development planned for Haverhill and it has advised that it is not. It considers that the development is necessary to ensure that a safe water supply can be maintained to existing residents and that this proposal would have come forward irrespective of the development at Haverhill.
34. Policy DM1 relates to the presumption in favour of sustainable development and reflects the overarching objective of the National Planning Policy Framework (NPPF) in this respect. Policy DM1 specifically states that where there no policies relevant to an application or relevant policies are out of date at the time of making a decision then the LPA will grant permission unless material considerations indicate otherwise, taking into account whether:

'Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or specific policies in the Framework indicate that development should be restricted'.
35. The site does not lie in an area designated for protection as set out in the NPPF, such as Greenbelt and sites of biodiversity or geological value. The

site is however located on land designated as countryside for the purposes of assessing it against the adopted development plan. The site is located within the parish of Little Wrattling and the cluster of dwellings and buildings known as Little Wrattling does not have a settlement boundary. The site is located approximately 0.5km from the northern edge of the settlement boundary drawn around Kedington.

36. Policy DM5 states that areas designated as countryside will be protected from unsustainable development. The Policy goes on to set out the circumstances in which a new or extended building will be permitted, in accordance with other policies within the development plan. The proposed water treatment works does not meet any of the exceptions to development set out in Policy DM5 and would not be considered a proposal for economic growth as referred to within the policy.
37. As previously stated the proposal is for infrastructure required to meet the water supply needs of existing and future populations. Whilst the Core Strategy 2010 and Joint Development Management Policies Document 2015 do not contain policies that specifically relate to such applications, Rural Vision 2031 does make reference to infrastructure and services. Chapter 14 sets out the aspirations for how rural St Edmundsbury will look and feel in 2031 in terms of infrastructure. Reference to infrastructure within the document includes that provided by third parties, required directly to service existing and proposed development (excluding roads and travel networks that are considered separately).
38. Rural Vision 2031 contains a number of aspirations in respect of the provision of infrastructure and services and Aspiration 17 states '*Water supplies are of good quality, readily available and used wisely*'. The document goes on to state that '*St Edmundsbury is in the driest region of the country and obtains its water from boreholes. Responsibility rests with Anglian Water who says that (subject to supply development schemes and demand management) there is sufficient water resource capacity to accommodate growth to 2031.*' In order to achieve this aspiration the action stated is '*Support Anglian Water's programme of managing water and reducing mains leakage.*'
39. Paragraph 149 of the NPPF makes reference to the need for plans to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes.
40. This application has been submitted by Anglian Water in accordance with its programme of managing water and is therefore directly related to Aspiration 17 in this regard. This does not mean that the Council will support schemes that have an unacceptable adverse impact elsewhere and in accordance with Policy DM1 the remainder of this report considers whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits.

Impact on character and appearance of the area

41. One of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside. Local Plans should include strategic policies for the

conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside.

42. Core Strategy Policies CS2 and CS3 seek to protect, conserve and (where possible) enhance the quality, character and local distinctiveness of the landscape. Policy DM13 of the Joint Development Management Policies Document seeks to protect the landscape character (including sensitive landscapes) from the potentially adverse impacts of development. The policy seeks proportionate consideration of landscape impacts and calls for the submission of new landscaping where appropriate. It also calls for landscape mitigation and compensation measures so there is no net loss of characteristic features.
43. The application site is located within the South Suffolk and North Essex Clayland National Character Area where the landscape is characterised by its undulating chalky boulder clay plateau that is dissected by numerous river valleys. Here the agricultural landscape is predominantly arable with a wooded appearance. Field patterns are irregular despite rationalisation with much ancient countryside surviving.
44. On a more local level the Suffolk Landscape Character Assessment places the application site within the landscape character type Rolling Estate Farmlands, where the characteristics of the landscape are described in similar terms to the National Character Area assessment.
45. The site occupies the corner of an arable field with the land to the south and west rising up and typical of the undulating landscape in the surrounding area. The site of the proposed water treatment works is devoid of any built-form or significant vegetation and the existing borehole buildings are situated to immediately north of the proposed works. The site is bounded by the A143 to the north-west and the B1061 to the north-east. A meat processing plant occupies land to the north of the site and there are a number of disused buildings located to the east of the B1061, immediately opposite the site. These buildings are partially screened by existing mature vegetation along the edge of the roadside.
46. The site may occupy the corner of an agricultural field but the wider context of the area is one of a semi-industrial/urban landscape with the existing industrial buildings featuring prominently in the landscape, dissected by the A143 that links the towns of Haverhill and Bury St Edmunds.
47. A Landscape and Visual Impact Assessment (LVIA) has been submitted with the application. This considers the effects of the proposal on the landscape character and highlights the likely visual receptors, in the form of local residents, users of public rights of way in the area and people travelling along the roads in the immediate locality. A Zone of Theoretical Visibility has been generated to show the theoretical extent of the surrounding area from which views to the proposed development at eye level may be possible.
48. A number of components of the water treatment works are several metres tall with the filtration tanks extending to 7.8m high. The water settlement tanks are 5.9m high, the balance tanks and dechlorination chamber is 4.9m high and the pump room is 4.4m high. The remaining buildings are under

4.0m. The LVIA describes the proposed development as being a 'visually distinguishable new element at the A143 and B1061 junction'.

49. A 3m high weldmesh fence with 0.9m of flat wrap security wire above is proposed inside the earth bund. The security gates will be constructed in the same way. Anglian Water has stated that the security fence is required under S208 of the Water Industry Act 1991 and the Security and Emergency Measures Direction 1998. On the edge of the site a 1.2m high timber post and rail fence is proposed.
50. Given the undulating nature of the area the proposed water treatment works will feature in certain views from all directions but primarily in views from the east. The undeveloped nature of the application site is such that the proposed development will have a significant adverse impact on the character of the site itself and its immediate locality. However, when considered against the context of the National Character Area the change to the wider area is considered to be much smaller and although there would be adverse effects on a local level the scheme would not result in a significant adverse effect on the existing quality of the wider character area.
51. The LVIA considers that the proposal would result in a medium magnitude of change to the Suffolk Landscape Character, which would be adverse in nature as the result of loss of part of an arable field. Existing built form, topography or vegetation will partially conceal the lower parts of the development from view, however, receptors along Old Haverhill Road, including local residents, will have close range views of the upper parts of the water settlement tanks and filtration plant. Similarly, those travelling along the A143 will have glimpsed views of the works between vegetation. Those approaching the site from Kedington will gain views of the works, including the earth bunds and soft landscaping with built-form rising above. Users of the footpath to the west of Kedington will also experience views of the tops of the installations, particularly in winter.
52. The LVIA assesses the effects of the proposal from several viewpoints in the area, with minor to moderate adverse effects experienced from all points, particularly within 1km of the site.
53. The applicant has sought to minimise the visual impact of the proposal by levelling the land in the centre of the site to accommodate the buildings and access road and using the excess soil to create a 2.5m high earth bund around the perimeter of the site.
54. The applicant has also submitted a Landscape Planting plan that includes new tree planting, new native hedge planting together with wildflower seeded areas and amenity grass seeding areas. The bunded areas will be treated with the wildflower and grass seeded areas with the trees and hedging towards the periphery of the site.
55. A temporary construction compound will be located adjacent to the borehole site. This area will be reinstated on completion of the works. Its impact on the landscape will therefore be temporary and subject to compliance with the submitted Construction and Site Management Plan it is considered that the impact of the compound on the character of the area will be minimal.

56. In accordance with Policy DM13 the applicant has had regard to the character of the landscape as identified In the Suffolk Landscape Character assessment. As stated above the proposal will have a significant impact at a very local level but will not fundamentally change or harm the wider landscape character of the area. Various visual receptors will experience the water treatment works in views across the landscape and the harm caused does weigh against the proposal. The landscape mitigation measures proposed will assist to assimilate the development into its surroundings to a certain degree but the scale of the built-form proposed is such that the development cannot be fully screened.
57. Policy DM13 requires that any harm to landscape features must not significantly and demonstrably outweigh the benefit of the proposal. As stated above, it is considered that the visual effects of the proposed water treatment works will result in some harm and this must therefore weigh against the proposal.

Consideration of alternative sites

58. Core Strategy Policy CS1 states that opportunities to use previously developed land and buildings for new development will be maximised through a sequential approach to the identification of development locations in settlements. Given that this Policy relates to the Spatial Strategy for St Edmundsbury it is considered that this statement is primarily aimed at identifying strategic sites for residential and employment development and is not a strict requirement for all forms of development.
59. Notwithstanding the above, Anglian Water has set out its rationale behind the choice of application site and it has taken a sequential based approach to reaching this decision. Anglian Water has stated that constraints such as land availability (finding a landowner willing to sell), land profile/topography, environmental/ecological constraints, visual impact, the location of the existing borehole and utility connectivity have influenced the location of the site.
60. A number of alternative sites have been considered and discounted by Anglian Water for a variety of reasons. Anglian Water has been in contact with the owner of the industrial premises opposite the site and explored various potential locations for the water treatment works. The LPA has been informed that the landowner was not willing to sell the amount of land required to accommodate the water treatment works and whilst it may have been desirable to utilise this existing brownfield site, it is not within the gift of Anglian Water to do so.
61. Anglian Water has responded to a representation received from a local resident suggesting a number of alternative sites. A number of these sites are located within the flood plain for the River Stour and would not therefore be appropriate for a water treatment works. Other sites are too small or the proximity to local residents was undesirable. One site suggested may lead to concerns over increase in traffic through Great Wratting village and the proximity of occupied properties.
62. The profile and topography of the application site allows Anglian Water to optimise site-hydraulics with the benefit of reducing power consumption. In addition, the re-use of material on site provides visual screening as well as

a robust sustainable solution. Consideration has also been given to traffic implications on the community during construction and operation. The application site can be accessed from the B1061 directly, whereas other options required trafficking near or through built up areas.

63. It is considered that Anglian Water has gone some way to demonstrate why this site has been chosen and sufficient explanation as to why alternative sites have been discounted has been provided.

Highway safety

64. The NPPF requires development proposals to ensure that safe and suitable access to the site can be achieved for all users. Policy DM2 reinforces this and requires applicants to produce designs, in accordance with standards, that maintain or enhance the safety of the highway network.
65. A new access to the water treatment works is proposed off the B1061. It is likely that the existing access to the borehole will be utilised during construction and a temporary crossing over a ditch between the site of the water treatment works and the construction compound will be required.
67. Once completed Anglian Water anticipates that vehicle movements will be small in number. Various deliveries will take place including fuel, orthophosphoric acid and sodium-hypochlorite and the scheme includes space for vehicles to pull off the highway in order to open the security gates.
68. During construction there will be a greater number of vehicle movements to and from the site and SCC Highways has confirmed its agreement to a Constriction and Site Management Plan submitted by Anglian Water in order to manage this process.
69. Subject to appropriate conditions regarding the timing of the access infrastructure on site SCC Highways raise no objections to the proposals and it is considered that the development will not have an adverse impact on the local road network or on highway safety.
70. An application for a temporary speed limit reduction on the A143 during the construction period will be made by Anglian Water. This is separate to the planning process and as the granting of a traffic order is outside the control of the LPA it cannot be conditioned.

Ecology

71. Policies DM10, DM11 and DM12 focus on the impact of development on sites of biodiversity and geodiversity importance, protected species and the mitigation, enhancement, management and monitoring of biodiversity. These policies reinforce the requirements of Policy CS2 and confirm that the local planning authority will have regard to the expert conservation advice provided by bodies such as natural England.
72. An Ecological Appraisal has been submitted with the application. An Extended Phase 1 Habitat survey was included within the appraisal and this identified arable fields, hard standing, semi-improved grassland, dry ditch

and specifies poor hedgerow on site. It also identified the potential suitability of habitat for birds, badgers, foraging/commuting bats, reptiles and great crested newts.

73. The proposal will result in the loss of this habitat, however, given that the site occupies a relatively small part of the surrounding arable field it is considered that this will not result in significant adverse effects. Scattered trees to the north-east of the site may have potential to be used by bats for roosting, however, they are a sufficient distance from the site not to directly affect bats, subject to appropriate lighting on site. Clearance of the site should be undertaken in accordance with the best practice outlined in the Ecological Appraisal in order to ensure nesting birds and any badgers and hedgehogs in the area are not adversely affected. The Ecological Appraisal also rules out any adverse effects on Great Crested Newts and reptiles subject to the precautionary mitigation measures outlined in the Appraisal being followed.
74. The applicant intends to plant native and local hedgerow species on the site once works are complete and this is considered to result in minor local biodiversity gain.

Ground conditions and contamination

75. The Environment Agency commented on the request for an Environmental Impact Assessment Screening Opinion made by the applicant prior to the submission of this application. The Environment Agency requested a Phase 1 Desk study together with a hydrological risk assessment.
76. The applicant submitted a Geo-environmental desk study during the course of the application, which has been reviewed by the Environment Agency. The report concludes that any risks to human health and controlled waters can be managed through the construction process.
77. As the controlling body for water abstraction it is considered that Anglian Water will take all the necessary precautions to ensure that risks to human health and controlled water are minimised. The Environment Agency has not recommended any investigative work or planning conditions. However, it is considered that a planning condition requiring any unexpected contamination to be reported to the local planning authority is an appropriate precautionary measure.

Residential amenity

78. Policy DM2 requires development proposals to ensure that they do not adversely affect residential amenity.
79. The closest residential dwellings are those on Green Row and the dwelling known as The Folly to the north-west of the site and Stone Cottage, to the south-east of the site towards the village of Kedington.
80. All of the plant to be contained within the proposed water treatment works will generate noise and a Noise Assessment Report has been submitted with the application to address this. Public Health & Housing have reviewed the Report, which was based on all plant operating simultaneously, as a worst case scenario, with and without the standby generator in operation. The

standby generator will be tested for 2 hours during the daytime on a monthly basis but will only operate in the event of a power cut.

81. The report concludes that, excluding the operation of the standby generator, the remaining plant items would generate noise levels that should result in daytime, evening and night-time internal noise levels that are below the WHO guidelines with windows open.
82. There is an adverse impact at The Folly and Green Row properties during the evening with the rating level being 1dB above the background level but this is not considered to be significant. During the night-time, the rating level has been calculated as 4dB above the background noise level at The Folly and Green Row, which, whilst this impact is approaching adverse but not significant, the operation of the plant may still be audible at the nearest residential properties and may give rise to some lack of amenity.
83. With the standby generator in operation, whilst the calculated rating level would indicate a low impact at the nearest residential property during the daytime, the rating level during the evening and night-time will be 6dB and 9dB respectively above the background noise levels at The Folly and Green Row and 1dB and 2dB above the background levels at Stone Cottage, at around 150m to the south of the application site. The operation of the plant, with the generator in operation, during the night-time, may therefore give rise to some lack of amenity but the internal noise levels, with windows open, will still be below the recommended WHO guideline values.
84. Public Health and Housing do not object to the proposal, however, due to the low background noise levels at the nearest residential properties to the application site, particularly during the night-time, the operation of the plant may give rise to some lack of amenity.
85. During the construction of the proposed water works there is potential for some noise and disturbance to be generated. The applicant has already submitted a Construction and Site Management Plan to address construction activities and issues such as construction hours etc. Compliance with this Plan can be secured by way of a planning condition.

Historic environment

86. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states;
In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority (LPA)... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
87. The terrace of dwellings known as 1-6 Green Row are grade II listed as is Stone Cottage to the south-east of the site. Further away from the site, to the east, lies the Scheduled Monument known as *Interrupted ditch system W of Hall Farm*. Historic England have been consulted on the proposal and raise no objections. Verbal advice has been sought from the Council's

Conservation Officer who also raises no objections to the proposal and is satisfied that the application site does not form part of the setting of the listed buildings or the scheduled ancient monument and on this basis no harm to these heritage assets is caused.

88. Suffolk County Council Archaeological Service has concluded that there would be no significant impact on known archaeological sites or areas with archaeological potential. There is no objection to development from the Service and no archaeological mitigation is required.

Other matters

89. The site is located in Flood Zone 1, this being one of the reasons behind the choice of site. SCC Floods and Water team has advised that it does not need to be involved in the design of the drainage system. At the request of SCC Highways a drainage strategy has been submitted and a planning condition is proposed requiring this strategy to be implemented prior to the water treatment works coming into use.
90. Cadent has responded to the consultation exercise carried out by the LPA and has highlighted the presence of a high or intermediate pressure gas pipeline and associated equipment within the vicinity of the site. Anglian Water refers to this in their submission, indicating that they are aware of it. Anglian Water will need to ensure that appropriate consents are in place prior to any development taking place on site. The presence of the pipeline would not warrant refusal of the application
91. The application site is located on grade 2 agricultural land. However the works are positioned on the corner of the field where access can be gained immediately from the highway, minimising the amount of land required for the proposal. Whilst the proposal will result in the loss of agricultural land it is considered to be very minor in nature given the amount of best and most versatile agricultural land within the Borough and the presence of the water treatment works is unlikely to have any impact on the agricultural industry.

Planning balance and conclusion:

92. The site is located outside the settlement boundary on land designated as countryside for planning purposes. The proposal for a water treatment works does not neatly fit into any development plan policy, however the Rural Vision 2031 is clear that the local authority will support Anglian Water's programme of managing water. Policy DM1 requires proposals where there are no policies relevant to the application to be considered in terms of whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits.
93. Anglian Water has clearly set out the need for the new water treatment works in its submission and its rationale behind its choice of site next to an existing borehole. In order to build resilience and capacity into the system the new works are required to ensure water supplies are maintained in the future for the benefit of local residents. The benefits of the scheme therefore attract very significant weight in favour of the proposal.

94. It is accepted that the proposed water treatment works will change the landscape character of the application site. On a local level these changes will be significant, however, the applicant is committed to minimising these effects through the use of hard and soft landscaping. The adverse effects of the proposal on the landscape do however attract moderate weight against the proposal.
95. The Noise Assessment Report submitted with the application identifies that there may be some loss of residential amenity to existing residents when the water treatment works is in operation. However, the noise levels omitted remain below WHO guidelines and the Public Health & Housing Team therefore raise no objections to the proposal. The generator on site will only be used in the event of a power failure and it is considered that any noise created will be short-lived and have only a minor impact on amenity. Given the conclusions of the Public Health & Housing Team it is considered that any loss of amenity attracts limited weight against the proposal.
96. Matters in relation to highway safety, ecology and biodiversity and drainage can be addressed by planning condition. The biodiversity enhancements proposed site attract limited weight in favour of the proposal.
97. On balance it is considered that the benefits attached to this proposal outweigh the identified adverse effects on the landscape and any minor adverse effect on residential amenity. The application is therefore recommended for approval.

Recommendation:

98. It is recommended that planning permission be **APPROVED** subject to the following conditions:
 - 1 The development hereby permitted shall be begun not later than 3 years from the date of this permission.
Reason: In accordance with Section 91 of the Town and Country Planning Act 1990.
 - 2 The development hereby permitted shall not be carried out except in complete accordance with the details shown on the following approved plans and documents:

Reference No:	Plan Type	Date Received
SS-PLG-0001_4P	Location Plan	05.10.2018
SS-PLG-0003_3P	Layout	05.10.2018
SS-PLG-0004_1P	Proposed Elevations	05.10.2018
SS-PLG-0005_1P	Proposed Elevations	05.10.2018
SS-PLG-0006_1P	Fence Plan	05.10.2018
SS-PLG-0007_1P	Visibility splays	05.10.2018
SS-PLG-0008_1P	PLAN	05.10.2018
SS-PLG-0009_1P	Bunding Details	05.10.2018
SS-PLG-0030_1P	PLAN	05.10.2018
SS-PLG-0010_1P	PLAN	05.10.2018
SS-PLG-0020_1P	PLAN	05.10.2018
SS-PLG-0040_1P	PLAN	05.10.2018
SS-PLG-0060_1P	PLAN	05.10.2018
SS-PLG-0065_1P	PLAN	05.10.2018

SS-PLG-0070_1P	PLAN	05.10.2018
SS-PLG-0080_1P	PLAN	05.10.2018
SS-PLG-0090_1P	Welfare Building	05.10.2018
SS-LAY-2005 1P	Other	18.01.2019
Construction and Site Management Plan	Other	18.01.2019
JMK 10201-RPS-Figure 01.01 Rev1	Landscape plan	05.10.2018
WAT-06742-KEHRWW-SS-LAY-2005	Other	18.01.2018
Drainage Strategy	Drainage Strategy	19.12.2018

Reason: To define the scope and extent of this permission.

- 3 The new vehicular access shall be laid out and completed in all respects in accordance with Drawing No. WAT-06742-KEHRWW-SS-PLG-0007 and made available for use prior to the water treatment works coming into operational use. Thereafter the access shall be retained in the specified form.
Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.
- 4 Before the access is first used visibility splays shall be provided as shown on Drawing No. WAT-06742-KEHRWW-SS-PLG-0007 and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.
Reason: To ensure vehicles exiting the access have sufficient visibility to enter the public highway safely and vehicles on the public highway have sufficient warning of a vehicle emerging, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.
- 5 Gates shall be set back a minimum distance of 10 metres from the edge carriageway and shall open only into the site and not over any area of the highway.
Reason: In the interest of highway safety, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.
- 6 The development shall be carried out strictly in accordance with the Construction and Site Management Plan submitted on 18 January 2018. No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan. The site operator shall maintain a register of complaints and record of actions taken to deal with

such complaints at the site office throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas, in the interest of highway safety, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 7 Prior to the water treatment works coming into use a layby shall be provided on the frontage of the site in accordance with details which previously shall have been submitted to and approved in writing by the Local Planning Authority. The lay-by shall be retained thereafter in the approved form.

Reason: To enable vehicles visiting the property to park clear of the carriageway in the interest of highway safety, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 8 Prior to the water treatment works coming into use the drainage scheme detailed in the 'Permanent Site Drainage' document submitted on 19 December 2018 shall be implemented in full in accordance with the agreed details.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal and to prevent hazards caused by flowing water or ice on the highway and to ensure that the proposed development can be adequately drained, in accordance with policies DM2 and DM6 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 14 of the National Planning Policy Framework and all relevant Core Strategy Policies

- 9 Prior to the water treatment works coming into operational use details showing an adequate vehicle turning space at the proposed substation within the site shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be retained thereafter and used for no other purpose.

Reason: To ensure that vehicles can enter and leave the public highway in a safe manner, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 10 The hours of site clearance, preparation and construction activities, including deliveries to the site and the removal of excavated materials and waste from the site, shall be carried out between the hours of 08:00 to 18:00 hours on Mondays to Fridays and between the hours of 08:00 to 13:00 on Saturdays and at no time on Sundays, Bank or Public Holidays without the prior written consent of the Local Planning Authority.

Reason: To protect the amenity of occupiers of adjacent properties from noise and disturbance, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 11 Any waste material arising from the site preparation and construction works shall not be burnt on site but shall be kept securely in containers for removal to prevent escape into the environment.

Reason: To ensure that the development will not have a negative impact on ground and surface water and to protect the amenity of adjacent areas, in accordance with policies DM6 and DM32 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 14 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 12 With the exception of the lighting details contained within the Planning, Design and Access Statement, no security lights or floodlights shall be erected on site without the submission of details to, and written approval from, the Local Planning Authority.

Reason: To prevent light pollution and protect the amenities of occupiers of properties in the locality, in accordance with policy DM2 and DM14 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 13 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To protect and prevent the pollution of controlled waters, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in accordance with policy DM14 of the West Suffolk Joint Development Management Policies Document 2015, paragraphs 170,178 and 179 of the National Planning Policy Framework (NPPF), Environment Agency Groundwater Protection: Principles and Practice (GP3) and all relevant Core Strategy Policies.

- 14 All planting comprised in the approved details of landscaping – Drawing No. JMK10201-RPS-Figure 01.01 Rev1 - shall be carried out in the first planting season following the commencement of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority). Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

Reason: To enhance the appearance of the development and ensure a satisfactory environment, in accordance with policies DM2, DM12 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

- 15 All ecological measures and/or works shall be carried out in accordance with the details contained in the Ecological Appraisal Report dated 28 March 2018 prepared by Mott Macdonald as already submitted with the planning application and agreed in principle with the Local Planning Authority prior to determination.

Reason: To secure biodiversity enhancements commensurate with the scale of the development, in accordance with policy DM12 of the West Suffolk

Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

Documents:

All background documents including application forms, drawings and other supporting documentation relating to this application can be viewed online [DC/18/2013/FUL](#)