
Bury Wastewater Treatment Works

Proposed construction of a Motor Control Centre (MCC) Kiosk

Planning, Design and Access Statement

September 2020

1 INTRODUCTION

This document supports a planning application on behalf of United Utilities relating to proposed upgrade works at Bury Wastewater Treatment Works (WwTW), Crossfield Street, Blackford Bridge, Bury, BL9 9TF.

Bury WwTW is a key United Utilities operational site that provides wastewater services to Bury and the surrounding area. The WwTW comprises operational land as defined by the Town and Country Planning Act 1990 (as amended); that is, land either specifically used or held for the purpose of carrying out United Utilities statutory undertakings. As a sewerage undertaker, United Utilities is obliged to provide the appropriate facilities for the treatment of wastewater to the standard required by the Water Resources Act 1991 and the Urban Wastewater Treatment Regulations 1994.

The proposed development that requires planning permission comprises the construction of a new Primary Settlement Tank (PST) Motor Control Centre (MCC) kiosk. The proposed kiosk is part of a wider programme of upgrade works that is necessary to enable compliance with an enhanced effluent discharge consent for phosphorous, as set by the Environment Agency, as well as to increase the treatment capacity of the WwTW to cater for predicted population growth based on a 2035 design horizon.

As set in section 3 below, much of the upgrade project scope is to be carried out under United Utilities permitted development rights for operational land, in accordance with Part 13, Class B (f) of the Town and Country Planning (General Permitted Development) Order 2015.

This statement has been produced by Stantec on behalf of United Utilities to provide Bury Council and statutory consultees with the necessary information required to consider the application. It provides an overview and explanation of what the development involves and why it is required. The statement also sets the context of the planning application and provides an analysis of the planning and environmental aspects associated with the proposed development.

2 APPLICATION SITE AND SURROUNDING AREA

Bury WwTW is situated east of the settlement of Blackford Bridge approximately 2.8km south of Bury town centre. The National Grid Reference for the centre of the existing WwTW site is

407924,380355. The WwTW facility is accessed via a private access road from Crossfield Street, which also serves a number of residential dwellings.

The WwTW site contains a variety of buildings and operational plant and machinery associated with the wastewater treatment use of the site. The WwTW is under the ownership of United Utilities and comprises United Utilities operational land.

A mixture of residential and commercial properties are located to the east of the WwTW, whilst the facility is immediately surrounded by areas of woodland / trees to the north, west and south which provides screening of the WwTW. The River Irwell also forms a defensible barrier to residential uses further to the north and west of the site.

The proposed MCC kiosk is to be located centrally on a parcel of land totalling 21.7m² that is currently amenity grassland within the wider operational boundary of the Bury WwTW facility. The proposed application boundary is shown in red on the Site Location Plan - Drawing Ref: 80061824-01-ADP-BURYZ-97-DR-T-10001 Rev. P02.

The WwTW is located within the planning jurisdiction of Bury Council and it lies within the designated Green Belt. The proposed structure which requires planning permission, as well as other elements of the proposed development to be constructed under permitted development rights, are within Flood Zone 2. The western section of the wider Bury WwTW lies within Flood Zone 3 (an area with a high probability of flooding).

3 PROPOSED DEVELOPMENT

The project forms part of UU's Asset Management Plan 7 programme which is a major programme of work to refurbish and upgrade assets across the North West region as agreed with the Environment Agency and the Office of Water Trading, to be implemented between 2020 and 2025.

The proposed upgrade works to Bury WwTW are necessary to achieve a final effluent quality of 0.3mg/l ortho-phosphate on an annual average basis and thus enable compliance with an enhanced effluent discharge consent for phosphorous, as set by the Environment Agency, as well as to increase the treatment capacity of the WwTW to cater for predicted population growth to 2035.

The upgrade works comprise the installation of new kiosks and equipment within the existing WwTW site, as well as some refurbishment of existing and equipment. The upgrade project will essentially provide a new treatment process within the WwTW, that will increase the overall treatment capacity and ensure that the enhanced effluent discharge consent for phosphorous can be achieved.

Planning Application

The proposed development for which planning permission is required comprises a MCC kiosk to be located in the central section of the WwTW site, on an area of land which is currently amenity grassland. The proposed kiosk will be rectangular in shape and 7.71m in length, 3.26m in width and 2.80m in height and will be constructed from Glass Reinforced Plastic (GRP) and coloured Holly Green (BS4800 14C39) to blend in with its surroundings. The kiosk will be located on a 1.2m tall platform, which itself will be positioned on a shallow concrete plinth and will be accessed via stairs and handrailing on the eastern elevation to be finished in galvanised mild steel, as shown on the enclosed Elevations Drawing Ref: 80061824-01-ADP-BURYZ-97-DR-T-10004. The MCC kiosk will contain electrical control equipment necessary to operate the refurbished PSTs.

Respective layout and elevational drawings submitted in support of this application are listed in Table 1 below.

Table 1: Planning Application Drawings

Drawing Title	Drawing Reference
Site Location Plan	80061824-01-ADP-BURYZ-97-DR-T-10001 Rev.P02
Site Layout Plan	80061824-01-ADP-BURYZ-97-DR-T-10002 Rev.P02
MCC Kiosk Elevations	80061824-01-ADP-BURYZ-97-DR-T-10004 Rev.P02

Permitted Development

In addition to the new MCC kiosk that requires planning permission, there are other proposed buildings, new plant and equipment also to be installed at Bury WwTW in connection with the wider upgrade project. The new plant and equipment constitutes permitted development under Part 13, Class B (f) of the Town and Country Planning (General Permitted Development) Order 2015, as: *"any other development in, on, over or under operational land other than the provision of a building but including the extension or alteration of a building."*

The project scope items that are to be installed under these permitted development rights are as follows:

- Refurbishment of existing PSTs and Ferric Dosing Kiosk
- Construction of secondary Ferric Dosing Kiosk
- Extension of existing Delivery Bund
- New Blind Tank
- 1.no primary ferric point of application and Eye Bath Kiosk
- 3.no secondary ferric point of application and Eye Bath Kiosks
- Installation of cable and dosing ducting

Details of the proposed works are identified on the enclosed Site Layout Plan, Drawing Ref: 80061824-01-ADP-BURYZ-97-DR-T-10002 Rev.P02.

A temporary construction compound will be required to enable the proposed development to be carried out. This is to be located within the WwTW site boundaries and on land to the north of the application site and as such constitutes permitted development under Part 4, Class A of the Town and Country Planning (General Permitted Development) order 2015, as: *“the provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or on land adjoining that land”*.

4 PLANNING POLICY

The following sections provide an overview of planning policy relevant to the proposed development.

National Planning Policy

The revised National Planning Policy Framework (NPPF) was published in February 2019. The NPPF covers many topic areas and provides general guidance in relation to matters such as promoting good design in new development and safeguarding conservation and enhancement of the natural environment. The general areas of relevance to this application include:

- A presumption in favour of sustainable development.

- Approving development proposals that accord with the development plan without delay.
- Proactive drive and support for sustainable economic development to deliver infrastructure that the country needs.
- Protecting Green Belt land - the NPPF advises that in considering development proposals, local planning authorities (LPAs) should ensure that substantial weight is given to any harm to the Green Belt. The NPPF advises that inappropriate development is, by definition, harmful to the Green Belt, and should not be approved except in very special circumstances. Paragraph 146 of the NPPF states that along with other certain forms of development, engineering operations are not inappropriate development within the Green Belt, provided that openness is preserved and does not conflict with the purposes of including land within in.
- Climate change and flooding - Section 14 of the NPPF emphasises that inappropriate development in areas at risk of flooding should be avoided but where development is necessary, it should be made safe without increasing flood risk elsewhere.

Circular 17/91 'Water Industry Investment: Planning considerations'

Circular 17/91 gives guidance to LPAs on the planning implications of the investment programmes being undertaken by the water industry. Paragraph 15 recognises that often the location of schemes is “constrained by the location of the relevant water company’s water sources and trunk mains” and that “the scope for altering the scale, location or elevation or treatment plants is limited.”

The Development Plan

Adopted Bury Unitary Development Plan

The development plan relevant to the proposed development comprises the Bury Unitary Development Plan (UDP), adopted August 1997. The Planning and Compulsory Purchase Act allowed the current Bury Unitary Development Plan (UDP) to be saved until 28 September 2007. Whilst the Bury UDP is therefore now technically time-expired, it remains the Council’s current development plan until replaced by future development plan documents.

The Bury UPD sets out local planning policies which guide development in the Borough. The accompanying Policies Map identifies the application site area as within the Green Belt.

Adopted Bury UDP policies of relevance include:

- EN1 – Built Environment: The Council will seek to protect, preserve and enhance the character, appearance and amenity of the Borough's built environment.
- EN5 – Flood Protection and Defence: The Council will seek to control development in a manner consistent with flood protection and the maintenance of flood defence systems.
- EN6 – Conservation of the Natural Environment: The Council will retain, protect and enhance the natural environment of the Borough, particularly in relation to areas of ecological, wildlife and geological importance.
- EN9 – Landscape: The Council will seek to protect, conserve and improve the landscape quality of the Borough, and will encourage the enhancement of landscapes, where appropriate.
- EN10 – Environmental Improvement: The Council will seek to improve the environmental quality of the Borough, within which priority will be given to an on-going environmental improvement programme.
- OL1 – Green Belt: The Council will maintain a Green Belt, ensuring that it fulfils the strategic purposes as set out within national planning policy.
- MW4 – Environmental Considerations for Waste Disposal Sites: The Council will ensure that new or extended waste disposal sites or facilities will not have an unacceptable detrimental effect on the local environment and that sites are adequately and, where appropriate, progressively restored.

Emerging Bury Local Plan

The Council is currently working on preparing a new Local Plan, which will guide future development in the Borough. The Local Plan Policy Directions consultation, which was held in Autumn 2018, sets out the proposed scope and a more refined direction for the planning policies that the Local Plan will contain. The draft Local Plan was due to be consulted on in during Summer 2019, however we understand that progress on the emerging Bury Local Plan has been put on hold pending progression of the Greater Manchester Spatial Framework (GMSF), which will set out the spatial planning strategy for Greater Manchester as a whole.

Below, we set out emerging Local Plan supporting documents which are deemed to be of material relevance to the application proposals.

Bury Infrastructure Delivery Plan (July 2013)

As part of the evidence base for the emerging Bury Local Plan, the Council has produced a series of Infrastructure Delivery Plans, the latest of which was published in July 2013 and covers the plan period 2012 to 2029.

The report includes details of the Borough's infrastructure requirements, as of 1 July 2013, and provides details of United Utilities investment schemes during the AMP5 period (2010 to 2015).

Appendix M of the document sets out Protocols for Joint Working between AGMA (Association of Greater Manchester Authorities – of which Bury Council is a member) and United Utilities. The following agreed overall objective of joint working between parties is set out within the document:

“To work together collaboratively to create sustainable long-term infrastructure plans which match sustainable spatial development strategies.”

Energy and Physical Infrastructure Topic Paper (October 2018)

The Energy and Physical Infrastructure Topic Paper (October 2018), which has been prepared in support of the emerging Local Plan, acknowledges that:

“Local Authorities are encouraged to work closely with these companies, particularly in infrastructure planning and location of new development. It is known that the sewer network in parts of the Borough is at capacity and additional development would require new infrastructure to prevent increased risk of sewer flooding.”

Greater Manchester Joint Waste Development Plan Document

The Joint Waste Development Plan Document (DPD) was adopted in April 2012 to provide the waste planning strategy for the ten Greater Manchester local authorities up until 2027. The document, which forms part of the adopted development plan for the area, seeks to enable the adequate provision of waste management facilities in appropriate locations for municipal, commercial and industrial, construction and demolition and hazardous wastes.

Whilst the Joint Waste DPD contains no specific policies relating to wastewater management, the document does contain development management policies which are used to assess

planning applications for waste management development. Whilst such policies are not of direct relevance to the proposed development, it is worth highlighting supporting paragraph 4.4 of the DPD, which states that: *“the construction and operation of waste management facilities should not give rise to an unacceptable impact on any interest of acknowledged importance, including the amenity of residents and the local and wider environment”*.

5 PLANNING ASSESSMENT

Principle of Development / Wastewater Infrastructure

The site is located within the defined Green Belt and Bury UDP Policy OL1 states that development proposals within the Green Belt will be approved where they accord with relevant national policy. As noted above, paragraph 146 of the NPPF confirms that engineering operations do not constitute inappropriate development within the Green Belt, provided that openness is preserved and that proposals do not conflict with the purposes of including land within it.

The application proposes development to support the established wastewater processing facility at Bury. By virtue of the scale of the proposals relative to the existing WwTW, the proposed development will not result in harm to the openness of the Green Belt.

The proposed development forms part an essential upgrade to the existing Bury WwTW that will cater for existing development in and around Bury and future population growth based on a 2035 design horizon. In addition, it will provide compliance with an enhanced effluent discharge consent for phosphorous, as set by the Environment Agency.

All new plant, equipment and structures are to be located within the existing operational boundary, replacing and upgrading existing end-of-life/redundant structures. As such, the proposals are considered to be of a scale and type appropriate to their location.

The development proposals are therefore in accordance with UDP Policies EN1, EN10, OL1 and MW4.

As set out above, the principle of the Council’s support for the development of wastewater infrastructure to prevent increased risk of sewer flooding is also set out within Bury Council’s

Infrastructure Delivery Plan and the Energy and Physical Infrastructure Topic Paper, and as such we consider that there is clear support for the principle of the proposed development.

Biodiversity and Ecology

Bury UDP Policy EN6 states that the Council will promote the conservation of natural environment, whilst Policy EN10 states that the Council will seek to improve the environmental quality of the Borough.

An Extended Phase 1 Habitat Survey of the WwTW site and the surrounding area was undertaken in June 2020, the findings of which are set out in the Ecological Appraisal Report (EAR), prepared by Stantec (dated September 2020) which forms part of this planning application.

The EAR identifies that the application site comprises amenity grassland which was assessed as being of negligible ecological value. The proposed development area was also considered to be of negligible value to foraging badgers, foraging bats, hedgehog and common terrestrial invertebrates. An eDNA survey of nearby waterbodies to assess for the presence of great crested newt was also undertaken, the result of which came back as negative, indicating that great crested newts are not present in nearby waterbodies.

Due to the limited ecological value of the site, and the small extent of the works, the PEA finds that there will be no significant adverse effects as a result of the proposed development. As a consequence, no project-specific mitigation is deemed necessary, however in accordance with United Utilities' commitment to incorporate enhancement opportunities where planning permission is required, measures to achieve 10% net gain are proposed, primarily through the creation of an area of wildflower grassland within the wider Bury WwTW site. Such measures are likely to provide biodiversity enhancement to the WwTW facility.

As mentioned above, the proposed development forms part of an essential upgrade to the existing Bury WwTW which will enable compliance with enhanced environmental standards for wastewater treatment. As such, the development proposals are deemed to be in accordance with UDP Policies EN6 and EN10.

Landscape and Visual Impact

UDP Policy EN9 states that the Council will seek to protect, conserve and improve the landscape quality of the Borough, and will encourage the enhancement of landscapes, where appropriate.

The proposed development is to be constructed within the existing operational boundary of Bury WwTW. The permanent above ground components of the development comprise for which planning permission is sought comprises an operational structure, next to existing on-site structures. The scale, height and colour of the proposed structure has been considered with the intention of merging the structures into the existing WwTW facility. The proposed upgrade works will not be prominent in views from outside the WwTW and the character of the proposed development will be in keeping with the character and use of the site as an operational WwTW. The proposed MCC building, including platform, will be a maximum of 4.2m in height and will be no larger in scale or appearance than much of the existing and upgraded WwTW plant, equipment and buildings.

There will be no significant impact to the character of the surrounding area and the proposed development is therefore considered to be in accordance with UDP Policy EN9.

Flood Risk

UDP Policy EN5 seeks to prioritise development in areas that are not at risk of flooding. According to the Environment Agency's Flood Map (Rivers and Sea), whilst the application site itself lies in Flood Zone 2 (an area with a medium probability of flooding), the western section of the wider Bury WwTW lies within Flood Zone 3 (an area with a high probability of flooding) as shown on the map extract at Figure 1 below.

Figure 1: Extract from Environment Agency Website Flood Map for Planning



Using the principles of the NPPF Sequential Test: Flood Risk Vulnerability and Flood Zone 'Compatibility' Table, the proposed development could be considered 'Essential Infrastructure' or 'Water Compatible'. According to the document, Water Compatible development is appropriate in all Flood Zones.

Notwithstanding this, as the proposed development is an alteration to the existing WwTW facility, the location of the proposal has been determined by operational requirements and it is considered impractical to suggest locating the proposed development on another site.

A Flood Risk Assessment (FRA) has been prepared by Ambiantal Environmental Assessment in support of this planning application (dated September 2020). The FRA finds that the risk of flooding from surface water to the proposed development is considered low. However, the risk of flooding from groundwater could be considered moderate and that the risk of fluvial flooding to the proposed development could also be considered moderate. Notwithstanding this, the FRA finds that as the proposed kiosk is an extension to the existing site use, the change in flood risk post-development could be considered negligible.

The FRA recommends that the kiosk should be raised through the use of a mezzanine/ steel platform to allow flood water to flow below the footprint and negate and increase in flood risk elsewhere. As shown on the MCC Elevations Drawing Ref: 80061824-01-ADP-BURYZ-97-DR-T-10004 Rev.P02, the MCC kiosk is proposed to be sited on a 1200mm platform, thus negating such risk.

The FRA concludes that given that the proposed development is for a kiosk which is classified as a water compatible development and is also a 'minor development' which is located in Flood Zone 2, the proposed development is considered to be suitable, assuming that appropriate mitigation is maintained for the lifetime of the development.

There will be no significant adverse flood risk as a result of the proposed development and therefore the application is considered to be in accordance with UDP Policy EN5.

Heritage Assets

UDP Policy EN1 states that the Council will seek to protect, preserve and enhance the character, appearance and amenity of the Borough's built environment.

A review of DEFRA's Magic Map system and Local Plan mapping show there are no Listed Buildings, Conservation Areas, Registered Parks/Gardens/Battlefields, World Heritage Sites or Scheduled Monuments in proximity to the application site. It is considered that there are no likely archaeological implications relating to the proposed development.

There are no archaeological designations that affect the WwTW site or the surrounding area. The upgrade works will be entirely within the existing WwTW site where the ground is likely to have been previously disturbed. As such there is low potential to impact on buried archaeology, and no further archaeological assessment was considered necessary.

The proposed development is unlikely to have any significant impact on heritage assets and the proposals are therefore in accordance with UDP Policy EN1.

Residential Amenity

The nearest residential receptors are located approximately 180m north of the application site, however these dwellings are segregated from the site by the River Irwell and mature tree lines

on the edge of the wider WwTW facility, which largely screen from the dwellings from the proposed works. The upgrade works will provide modern plant and equipment, there will be no increase in odour emissions and the works will not generate any significant noise or vibration.

The construction phase of the development has the potential to impact temporarily upon the amenity of the surrounding area due, for example, to the creation of dust and noise associated with groundworks, machinery operating on site and increased vehicle movements. Construction work will be limited to the industry standard of Mondays to Fridays 08.00 and 18:00 and 08.00 to 13:00 on Saturdays. The works will be carried out in accordance with a Construction Environmental Management Plan that will set out the control measures which will mitigate such impacts. These include, for example, the control of workings hours, dust suppression and switching off machinery when not in use.

There will be an increase in vehicular movements to the WwTW during the construction period, although estimated numbers of vehicles are unknown at this stage, however any associated impacts will be temporary in nature. Traffic volumes will vary throughout the construction programme depending on the construction activity.

Once the upgrade works are complete there will be no significant increase in the level of traffic associated with the ongoing operation of the WwTW and there will be no intensification in the use of the site. It is considered that the proposed development will have no significant impact on the amenity of the surrounding area and the development proposals are therefore in accordance with Policy ENV1.

5 CONCLUSION

The proposed upgrade works to Bury WwTW are required to enable compliance with an enhanced effluent discharge consent for phosphorous, as set by the Environment Agency, as well as to increase the treatment capacity of the WwTW to cater for predicted population growth in the catchment area to 2035. The proposed development will therefore contribute towards ongoing compliance with new and enhanced environmental standards.

The project forms part of UU's Asset Management Plan 7 programme which is a major programme of work to refurbish and upgrade assets across the North West region as agreed with the Environment Agency and the Office of Water Trading.

The proposed development comprising the construction of a new MCC kiosk. Whilst the proposals involve development on land within the defined Green Belt, as explained within this supporting statement, national planning policy confirms that engineering operations do not constitute inappropriate development within the Green Belt, provided that openness is preserved and the proposals do not conflict with the purposes of including land within it.

The application proposes development to support the established wastewater processing facility at Bury. By virtue of the scale of the proposals relative to the existing WwTW, the proposed development will not result in undue harm to the openness of the Green Belt and they accord with relevant national and local planning policies.

As well as the principle of the development proposals being supported by the adopted and emerging development plan, the proposed development is also supported by Circular 17/91: 'Water Industry Investment: Planning considerations'.

For the reasons summarised above, it is considered that the proposed development should be granted planning permission.