

Planning Committee

9 October 2026

Agenda item number 11

Suffolk Water Recycling, Storage and Transport Project update

Report by Nationally Significant Infrastructure Projects Officer

Summary

This report provides Members with an update on the latest position with Suffolk Water Recycling Transfer and Storage project proposed by Essex and Suffolk Water.

The Preferred Options for the Project were announced in July 2026. In August 2026 a formal application was made to the Planning Inspectorate (PINS) for an Environmental Impact Assessment (EIA) Scoping Opinion accordance with Regulation 8(1)(b) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

The EIA Scoping Opinion is the subject of consultation by PINS, and the Broads Authority is a consultee. Due to the regulatory timescales associated with the EIA Scoping Consultation and the timing of its submission it has not been possible to bring comments to Members prior to the formal deadline. Officers have therefore submitted officer level comments, and these are set out in Appendix 1 of the report, which Members are asked to endorse.

Recommendation

Members are asked to note the contents of the report and endorse the Officer level comments in Appendix 1.

1. Introduction

- 1.1. The East of England is among the driest regions in the UK, a view supported by the Environment Agency assessment that classified the region as a 'Serious Water Stressed Area'.
- 1.2. To ensure that there is enough water for now and for future generations, Essex and Suffolk Water (ESW) are developing the Suffolk Water Recycling and Transfer and Storage (SWRTS) project. SWRTS seeks to develop a new Advanced Water Recycling Plant, capable of producing 11 million litres per day of purified recycled water, together with strategic network enhancements which will support a more reliable and resilient water supply for the region.
- 1.3. The two main project elements are outlined below:

- a) Advanced Water Recycling Plant: The Project will divert treated recycled water from Anglian Water's existing Lowestoft Water Recycling Centre (WRC) to the proposed Essex & Suffolk Water Advanced Water Recycling Plant to be located to the north of Lowestoft.
 - b) Strategic Network Enhancements: These take the form of service reservoirs and new pipelines. Water will be drawn from the River Waveney and treated to meet drinking water standards. To ensure a reliable supply, the water will be stored in two new service reservoirs and will be delivered to homes and businesses through a newly built network of pipelines. The prospective locations of both the central service reservoir (at Sibton) and the western service reservoir (in the Eye area) are outside of the Broads Executive Area.
- 1.4. However, the potential location of the pipeline which will carry water from the River Waveney to the proposed Advanced Water Recycling Plant near Lowestoft will cross into the Broads Executive area in the Somerleyton and Geldeston areas. Further details of the potential route of the preferred pipeline corridor are shown on the SWRTS interactive Map: [Suffolk Water Recycling, Transfer and Storage Project \(suffolkwaternetwork.co.uk\)](https://suffolkwaternetwork.co.uk)
- 1.5. Furthermore, the outfall of the proposed pipeline corridor which seeks to return treated water to the River Waveney also falls within the Broads Executive Area.

2. Statutory and Non-Statutory Process

- 2.1. Due to the scale of the project, it will require a Development Consent Order to be approved. Therefore, the project forms a Nationally Significant Infrastructure Project (NSIP) and will be dealt with by the Planning Inspectorate on behalf of the Secretary of State. The Development Consent Order process is a streamlined consent route for major infrastructure projects and was established to provide a faster and fairer process for interested parties, such as landowners, organisations and members of the public.
- 2.2. The process puts emphasis on early engagement with communities and stakeholders to allow for the opportunity to influence a project before an application is made for development consent
- 2.3. There is a prescribed process for such applications, and this is being followed by ESW. The Broads Authority is a consultee in this process, and your officers have actively participated in early consultation exercises helping to shape the project.
- 2.4. The Stages in the DCO process for this NSIP can be summarised as follows:
- Stage 1: Non- Statutory Consultation October 2025
 - Stage 2: Announcement of Preferred Options July 2026
 - Stage 3: Environmental Impact Assessment Scoping Submission August 2026
 - Stage 4: Public Consultation (Statutory) Mid 2027

Stage 5: DCO Application Submitted – Early/Mid 2028.

- 2.5 Members may recall receiving a presentation on the Project from the Planning Policy Officer at the Non-Statutory Consultation Stage in the Autumn of 2025.
- 2.6 Since that time there have been a series of regular monthly meetings between the ESW team and the relevant affected local planning authorities (LPAs) to discuss the scheme. The LPAs have also met as a collective group on regular occasions. The ESW team has held several thematic workshops and meetings covering issues such as landscape, highway/access, heritage/archaeology, ecology, climate change and trees. Broads Authority Officers have also had bespoke meetings with the ESW team to discuss additional specific BA matters of concern such as landscape impact, navigation issues, dark skies and the treatment of peat.
- 2.7 In April 2026, ESW held a comprehensive workshop attended by a range of interested parties and LPAs to discuss the potential options for the scheme. The key matter for the Broads Authority is the proposed pipeline corridor within the Broads Executive Area and the return outfall pipe to the Waveney.
- 2.8 Following the April workshop, the ESW consultants produced the Broads Feasibility Study which sought to ensure that the proposed Broad Pipeline and the delivery of it through horizontal directional drilling (HDD) was technically feasible. It is recognised that the installation of a pipeline within the Broads is a difficult proposition however the study concluded that it was technically feasible. That being said, using the method of open trenches will also probably be difficult given the water levels in the area. Your officers have examined the report and agree with the methodology used to arrive at the report's conclusions. Two specific meetings with the report authors and BA officers were held in August 2026.
- 2.9 Members will note from the introduction above that the Preferred Options for the Project were published in July 2026. These are published for information; they are not currently the subject of consultation although informal comments have been fed back which reinforce issues previously raised in liaison meetings. The Preferred Options for the pipeline corridor are now the subject of further technical development and informal consultation feedback with BA Officers which will continue to shape the statutory consultation due to take place in 2027.
- 2.10 The EIA Scoping submission to PINS is subject to a formal consultation process and there is a prescribed 28-day period in which this must happen. That period initially ran from 2nd September to 30th September but has been extended to 2nd October due to an administrative error on the part of PINS. Your officers and retained consultants have examined the documentation and the collated comments are shown in Appendix 1. It should be noted that a consultation on the EIA Scoping is essentially a consultation on what information should be included or 'scoped in' to the Environment Statement that will be produced to support the full Development Consent Order application

anticipated to be in 2028. The comments in Appendix 1 have had to be submitted to PINS in advance of this meeting due to the statutory timescales.

3. Financial implications

- 3.1. The financial implications of the SWRTS project relate to the Officer time taken to assess and comment on proposals and to participate in project feedback as it progresses. ESW have established a Planning Performance Agreement (PPA) with the relevant local planning authorities to enable them to recover costs associated with this. The Broads Authority is a participant in the PPA.

4. Risk implications

- 4.1. While the relevant Secretary of State will decide if development consent should be granted for a NSIP application it is in the local authority's interests to: proactively engage with the applicant on their proposed scheme, particularly during the pre-application stage and take part in all the stages of the NSIP process. [Nationally Significant Infrastructure Projects: Advice for Local Authorities - GOV.UK](#)
- 4.2. Therefore, there are risks to the Authority associated with not participating at this stage and a scheme coming forward which could damage the Broads. The potential damage relates to a negative impact on the landscape, ecology, dark skies, loss of/impact on peat resources, impact on highway safety both in the short and long term.

5. Conclusion

- 5.1. As outlined above Members are asked to note the progress of the SWRTS project and endorse the comments set out in Appendix 1.

Author: Andrea Long

Date of report: 23 September 2026

Background papers:

[Nationally Significant Infrastructure Projects: Advice for Local Authorities - GOV.UK](#)

[Suffolk Water Recycling Transfer & Storage Project website](#)

Broads Feasibility Study

[Broads Plan](#) strategic objectives:

B2: Promote best practice water capture and usage across the Broadland Rivers Catchment and reduce point and diffuse pollution into the floodplain and water courses.

Appendix 1 – [Combined BA Response to EIA Scoping Consultation](#)

Appendix 1 – Combined BA Response to EIA Scoping Consultation

BA/2026/0252/SCOCON

Application PINS ref: WA0210003

Proposal/Description

Proposal/Description: Proposed application by Essex and Suffolk Water (the applicant) for an Order granting Development Consent for the Suffolk Water Recycling Transfer and Storage (the proposed development) Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Detailed comments

1. Landscape

- 1.1. As expected, a full Landscape and Visual Assessment has been scoped in to accompany the planning application to address potential significant landscape character and visual impacts on the landscape and to inform the scheme design and preservation and restoration of the landscape. The application is supported by an EIA Scoping Report (August 2026) prepared by Essex and Suffolk Water. Chapter 10 covers Landscape and Visual issues with supporting figures.
- 1.2. Currently no Zone of Theoretical Visibility (ZTV) has been prepared. Study areas of 3km radius for landscape and a 5km radius for views from the boundary of the EIA Scoping Area proposed, and at this preliminary stage are considered appropriate. The Figures showing the Landscape Character Areas (LCA) is incomplete within the scoping document due to time restrictions. For clarity, all affected and nearby neighbouring LCAs need to be scoped in.
- 1.3. In terms of Baseline data, this generally appears to be what we would expect to be scoped in. In addition, the following need to be scoped in:
 - [Design Guide and Code for the Broads Supplementary Planning Document:](#)
 - [Landscape Character Assessment Supplementary Planning Document \(SPD\)](#)

Significant Effects

- 1.4. We would expect to see proposed changes of topography to be included as a potentially significant landscape impact during the Construction Phase and the Operational Phase.

Night-time/Daytime and Assessment

- 1.5. We advise that we need to see residential receptors within 500m of above ground components where the daytime effects during operations and construction phases are likely to be significant needs to be both be scoped in.
- 1.6. Considering the intrinsic nocturnal character of the Broads, Adopted Local Plan Policy DM22 ([Local-Plan-for-the-Broads.pdf](#)), Local Plan Policy POSP7: Tranquillity in the Broads, we expect night-time assessment of likely significant visual effects within the Broads Authority Executive Area to be scoped into the ES.

Mitigation

- 1.7. Tertiary (Inexorable) Mitigation (Construction Phase): The inclusion of soils management needs to be in line with Defra soil handling guidance as provided via the Code of Practice for the Sustainable Use of Soils on Construction Sites and the updated Good Practice Guide for Handling Soils in Mineral Workings, which set out practical standards for stripping, storing, and restoring soils sustainably.

Assessment Methodology

- 1.8. Assessment Methodology: The assessment methodology is broadly consistent with the principles set out in GLVIA3 and accords with established best practice. We welcome confirmation that the assessment of the Proposed Development's effects during the construction phase and in Year 1 following completion will adopt a precautionary worst-case approach, assuming winter conditions when existing vegetation is not in leaf. This approach is consistent with the Planning Inspectorate's NSIPs: Pre-Application Advice on Environmental Impact Assessment (July 2026).

2. Local Planning Policy

- 2.1. The list of Local Planning Policy documents appears relatively comprehensive; however, the Diss and District Neighbourhood Plan must be scoped in (adopted by South Norfolk Council and Mid-Suffolk District Council on 16 October 2023).
- 2.2. The proposals need to scope in the following policies from the Local Plan for the Broads 2015 – 2036 [among others]:
 - Policy DM8: Green infrastructure
 - Policy DM13: Natural Environment
 - Policy SP7: Landscape character
 - Policy DM16: Development and landscape
 - Policy DM22: Light pollution and dark skies
 - Policy SP11: Waterside sites
 - Policy DM28: Development on waterside sites in employment or commercial use, including boatyards

- Policy SP13: Navigable water space
- Policy DM31: Access to the water
- Policy SP14: Mooring provision
- Policy DM33: Moorings, mooring basins and marinas
- Policy DM43: Design
- Policy DM46: Safety by the water

2.6. Landscape and Visual Impact Assessment (LVIA)

3. Ecology

- 3.1. The information submitted as the EIA Scoping Information appears comprehensive. However, a list of the protected species that the survey will be focusing on is required. It is assumed that this includes the invertebrates, for example the Fen Raft Spider *Dolomedes plantarius*, the Little Whirlpool Ramshorn Snail *Anisus vorticulus* and Desmoulin's whorl snail *Vertigo moulinsiana*, but we need to have this confirmed.
- 3.2. As part of the scheme progression, we still need to look at the core data and the solution as the pipeline crosses the marshes and side valleys. Useful discussion has taken place in terms of the HDD (Horizontal Directional Drilling) for the main Broads crossing but have not fully resolved the final crossing before the outflow which will be part of ongoing discussions.

4. Trees

- 4.1. The Environmental Statement for the proposed water recycling transfer and storage project needs to include sufficient arboricultural information to identify and assess the likely significant effects on trees, tree groups, hedgerows and woodlands, including those within or adjoining the Broads Authority. The information needs to meet the requirements of Regulations 10 and 11 and Schedule 4 of the EIA Regulations, while remaining proportionate to the current stage of the project. It needs to establish a reliable strategic baseline rather than duplicate the detailed tree-by-tree work that will be required once the design is sufficiently developed.

Arboricultural Baseline

- 4.2. Maps, plans or suitable spatial data needs to identify the presence, location and general distribution of trees, tree groups, hedgerows and woodlands within the project area and, where relevant, immediately adjoining it. The Broads Authority boundary needs to be clearly shown where the scoping area overlaps or approaches it. The baseline needs to indicate the principal species, approximate age or maturity, general condition and arboricultural or ecological value, with particular attention to important individual trees, linear features, field boundaries, roadside vegetation and areas where proposed infrastructure may interact with established vegetation. Targeted arboricultural and

hedgerow survey work needs to therefore be undertaken to a level sufficient to characterise the existing resource, identify sensitive locations and inform route selection. A detailed survey of every individual tree is not necessarily required at the Environmental Statement stage, provided the information is robust enough to identify likely significant effects and areas requiring further assessment.

Potential Effects

4.3. Potential effects include:

- Direct removal, severance or fragmentation of trees, hedgerows and woodlands during site clearance or construction.
- Damage to retained roots, stems or crowns from excavation, changes in ground levels, access arrangements, temporary compounds, storage or construction activity.
- Soil compaction, altered drainage, contamination, pollution, increased exposure and other changes to the growing environment.
- Effects where roads, working corridors, HGV routes, rights of way, cycleways, pipelines or other infrastructure cross or run adjacent to field boundaries, roadside verges or other linear vegetation.
- Loss of landscape, ecological, screening or connectivity functions associated with important trees and hedgerows.

4.4. The assessment needs to identify the likely scale, duration, reversibility and significance of these effects at an appropriate level. It needs to distinguish locations where impacts are unlikely to be material from those where route refinement, specialist construction methods or more detailed arboricultural assessment will be required.

Legal Protections and Constraints

4.5. The Environmental Statement needs to identify known statutory and planning protections affecting trees and woodland, including Tree Preservation Orders, conservation areas and other relevant designations or constraints. Ancient woodlands, veteran trees, important hedgerows and other features of particular arboricultural, ecological or landscape value needs to be clearly identified. The assessment needs to explain how these constraints have influenced route selection, design, construction methods and mitigation.

Detailed Design and Implementation

4.6. Once the detailed design is brought forward, fully detailed Arboricultural Impact Assessments needs to be commissioned in accordance with BS 5837:2012. These assessments need to examine the relationship between proposed works and retained trees, including root protection areas, access, excavation, service installation, drainage, changes in levels, construction methodology and tree protection measures. Project-specific arboricultural method statements need to be prepared where works are proposed within or close to sensitive rooting environments. This detailed stage needs

to build on, rather than duplicate, the strategic information supplied with the Environmental Statement.

Omissions

4.7. The following omissions to be addressed:

1. Clearly map the Broads Authority boundary together with trees, tree groups, hedgerows and woodland that could be affected.
2. Prepare a proportionate strategic arboricultural baseline covering distribution, principal species, maturity, condition, value and known protections.
3. Assess both direct and indirect effects and state their likely significance.
4. Demonstrate application of the mitigation hierarchy, supported by practical route, construction, protection, compensation and monitoring measures.
5. Undertake targeted hedgerow and arboricultural surveys where current information is insufficient.
6. Commission detailed Arboricultural Impact Assessments and method statements at the detailed design stage in accordance with BS 5837:2012.
7. Consult the Broads Authority and other relevant stakeholders as the assessment and design develop.

4.8. A comprehensive Environmental Statement cannot properly address trees and arboricultural matters without a sufficiently reliable baseline and a clear assessment of the likely significant effects. At this stage, that information may remain strategic and proportionate, but it needs to be specific enough to identify sensitive features, demonstrate that avoidance has been prioritised and show that remaining effects can be appropriately mitigated or compensated. Detailed assessment during design development will then be required to translate those commitments into workable route alignments, construction controls and long-term planting and monitoring proposals.

4.9. Section 10.6.1 of the Scoping Document with regard to ancient and veteran trees which states as follows:

“Landscape features such as ancient woodland, veteran trees and trees subject to tree preservation orders (‘TPOs’) located at distances of greater than 15m from the Order limits are proposed to be scoped out of the assessment in the ES, as it is unlikely that the root protection zones of these will be directly impacted by the Proposed Development’s construction, operational or decommissioning activities.”

4.10. Government advice on making planning decisions for ancient woodland, ancient trees and veteran trees states that for ancient woodland, a buffer zone of at least 15 metres needs to exist from the boundary of the woodland (it does not define boundary so I have always taken this as the edge of the canopy), whilst for ancient or veteran trees the buffer zone needs to be at least 15 times larger than the diameter of the tree. The

point being with both these sets of advice is that these are just the minimum requirements. If an assessment shows that impacts from the development are likely to extend beyond these standard distances, a larger buffer zone will be required.

Moreover, with ancient and veteran trees, the buffer is not capped so a tree with a trunk diameter of 2 metres would require a 30 metre buffer zone. This size of tree is not at all unlikely for a veteran – a statistical analysis of Hayden’s (the arboricultural consultants for the Broads Authority) tree inspections going back over 15 years shows (i) the largest veteran oak trees up to 2.39 metres in diameter – thus requiring a buffer zone of almost 36 metres – and (ii) an average stem diameter of 1.36 metres – requiring buffer zones in excess of 20 metres.

- 4.11. For this reason, it is advised that the proposed scoping out of ancient woodland and veteran trees at 15 metres provides inadequate protection, and instead the scoping out boundary needs to be increased to at least 30 metres.

5. Historic Environment

- 5.1. Section 11.3.1: The Broads Authority also have responsibilities relating to the historic environment as the Local Planning Authority for the Broads Authority Executive Area. The Broads Authority needs to be added to this list and will be engaged throughout the process as a stakeholder in the Historic Environment.
- 5.2. Please refer to Norfolk County Council’s advice relating to the historic environment, including archaeology.

6. General and Detailed Observations

- a) ‘Broads National Park’ –the term ‘National Park’ is used for marketing. In planning terms, the Broads is not a National Park. We are a member of the National Parks family or have status equivalent to a National Park. Using the ‘The Broads’ and when referring to our area ‘Broads Authority Executive area’ would be acceptable.
- b) Figure 9 and Figures 11 Superficial Geology – the colours used are not easily distinguishable.
- c) Figure 20-2 Agricultural Land Classification (ALC) August 2026 Sheet 4 of 14 and so on – I see there is a lot of predicted grade 3a. I cannot see in the document what data source of methodology they used for predicted ACL. Will they confirm the ACL through tests?
- d) Figure 15-1 Air Quality Baseline Environment August 2026 Sheet 3 of 14 and 4 of 14 says the grey is LPA area – that is not the case as it does not segregate out the BA area. It might be Local Authority area – that might be what they mean.
- e) Appendix 6.1 could reference the BA [Peat development guide](#).
- f) Appendix 8.1, 12.1 – are the East inshore and offshore Marine Plans of relevance?

- g) Some maps (Figure 10-1 Landscape Character Areas August 2026 Sheet 9 of 14 and so on) show South Norfolk and Broadland Landscape Character Area but they do not show the Broads Landscape Character Assessment Area. Sheets 1, 2, 3, 4, 5 need to show this.
- h) Noise and vibration: Species need to also be identified as receptors.
- i) The transport section of the final ES (environmental Statement) needs to reflect the landscape impacts of the potential access trackways across the Broads that may be needed. Due regard needs to be had to the Broads Protected Landscape Status.
- j) The climate change section of the Final ES needs to refer to adaptation to the effects of climate change? Resilience and mitigation, are referenced in the scoping but not but not adaptation and this needs to be scoped in.
- k) Peat: Due regard needs to be had in the final ES to the importance of peat in respect of climate change and heritage – specifically the potential of the Broads for exceptional waterlogged archaeology as referenced by Historic England.
- l) Navigational effects 17.1.5 and navigation impact assessment. The ES will require further detail on both. Any potential navigation impacts or impediments will need to be scoped into the Final ES. Where will navigation impacts potentially occur? The pipes are to go under the river.
- m) Page 772 – reference to the Broads and tourism is required.
- n) Chapter 17 – communication to businesses and people in the area will be key
- o) Chapter 18 – should there be reference to the safety of the workers constructing the site included in this section?
- p) Chapter 20 – peat soils – HDD will result in the removal of the soil that is displaced by the drilling and the pipes. The ES mitigation section will need to reinforce the need to maintaining the peat as wet and what will happen to peat spoil. It is unclear if excavated peat will be considered a waste. The Broads Authority's [Peat development guide \(PDF\)](#) needs to be scoped into the ES.