

Key question B: Will development have an adverse effect on river quality downstream with regards to the objectives of the Habitats Directive and Water Framework Directive? MARCH 2010

4.11 The current water quality status of various river stretches is set out in Table 2, alongside the water quality standards that must be achieved for the river stretch to achieve 'Good' status, both in terms of the current consent and the quality consent limits required for projected future growth.

4.12 As set out above, it has been demonstrated that the proposed growth for Fakenham and Holt cannot be accommodated within the existing consent for the local WwTWs. To accommodate the full level of growth the volumetric consent for the WwTWs would need to be increased and the quality consent limits adjusted accordingly to ensure no deterioration in water quality.

4.13 Using the projected flows provided by AWS (table 1) alongside current river quality (table 2) and WwTW current discharge quality, the Environment Agency River Quality Planning tool has been used to assess what WwTW consent limits would be required to meet the requirements of the Water Framework and Habitats Directives. Indicative consent limits have been calculated for both the current flow consent, and the future flow consent that would be required to accommodate all of the proposed development growth (where appropriate) and this is also presented in Table 2.

4.14 If the volumetric consents for **Fakenham and Holt** were to be increased to accommodate all of the proposed growth the water quality consent limits for phosphorus would need to be tightened beyond what is currently regarded as 'Best Available Technology Not Entailing Excessive Costs' (BATNEEC) in order to meet the objectives of the WFD and HD. Current understanding is that the feasibility, cost effectiveness and cost-benefits of operating a WwTW beyond 'BATNEEC' is limiting to the proposed growth. Consequently, the proposed development growth in Fakenham and Holt is currently considered to be constrained by the requirements of the WFD and/ or HD. Further information on this issue is unavailable at this time, and it is likely that further certainty on this issue will not be available until more work is undertaken by the EA and the Water Company in preparation for the next Water Company Price Review (2014). This issue is discussed in more detail in the next section.

4.15 Further consideration has been given to the discharge consents for **Corpusty, Blakeney** (Cley WwTW), **Roughton and Walsingham** (Great Walsingham WwTW), the outcomes of the EA RoC and the current WFD status of the downstream waters. Based on this, the EA considers it unlikely that even with a small increase in the consented volume of the discharges to accommodate the proposed growth (which AWS has confirmed is not required), the objectives of the WFD and/or HD could be met through tightening the quality consent limits within what is currently regarded as 'Best Available Technology Not Exceeding Excessive Cost'. Consequently, the proposed development growth in **Corpusty, Blakeney, Roughton or Walsingham** is not currently considered to be constrained by the requirements of the WFD and/ or HD.

4.16 While there remains uncertainty over precisely whether the proposed growth in **Hoveton** can be accommodated at **Belaugh WwTW**, a solution for dealing with 'excess' waste water flows in the catchment has been identified through the GNDPWCS (i.e. using Whitlingham WwTW). Consequently, the proposed development growth in Hoveton is not currently considered to be constrained by the requirements of the WFD and/ or HD, but it