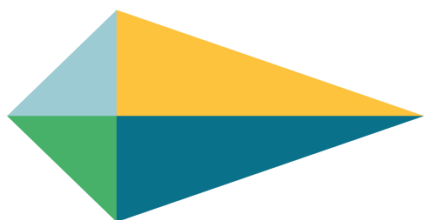


# Responses to Mutford Neighbourhood Plan

## Regulation 16

Consultation period: 26 April to 7 June 2019

Published June 2019



**EASTSUFFOLK**  
COUNCIL

# Responses

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## What is the purpose of this document?

Mutford Parish Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

This document contains all representations received during the representations period of 26<sup>th</sup> April to 7<sup>th</sup> June 2019.

## East Suffolk Council

We are satisfied that the working party has addressed our comments made as part of the Regulation 14 pre-submission consultation, as detailed in the submitted Consultation Statement. In our opinion the neighbourhood plan is in general conformity with the strategic policies in the East Suffolk Council – Waveney local plan.

We are currently carrying out the Habitats Regulations Assessment screening process on behalf of the neighbourhood plan working party in order for the neighbourhood plan to comply with EU obligations and address recent amendments in the Planning Practice Guidance. The outcome of this screening will be made available once it is complete.

We have worked to support the development of the Mutford Neighbourhood Plan and have developed a positive working relationship and constructive dialogue with the neighbourhood plan working party. We commend the strong progress they have made with their plan.

Please note that these comments are given at an Officer level without prejudice to any future decisions that the Council may make.

# Environment Agency

Thank you for your letter relating to the Mutford Neighbourhood Plan. We have assessed the draft Neighbourhood Plan as submitted and our letter contains our response and information in relation to environmental issues that should be considered during the development of the Neighbourhood Plan.

Our principal aims are to protect and improve the environment, and to promote sustainable development, we:

Act to reduce climate change and its consequences

Protect and improve water, land and air

Work with people and communities to create better places

Work with businesses and other organisations to use resources wisely

You may find the following two documents useful. They explain our role in the planning process in more detail and describe how we work with others; they provide:

An overview of our role in development and when you should contact us.

Initial advice on how to manage the environmental impact and opportunities of development.

Signposting to further information which will help you with development.

Links to the consents and permits you or developers may need from us.

Our role in development and how we can help:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289894/LIT\\_2745\\_c8ed3d.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf)

## **Water Recycling Center**

In the section 'Future Development' the Neighbourhood Plan makes reference to capacity at the local Water Recycling Center and the emerging Waveney Local Plan. We recommend that this is taken forward and made into a policy locally for the Neighbourhood of Mutford. We welcome the addition of the drainage hierarchy being included in this policy where new development should connect to the public mains sewer, wherever possible. Government guidance contained within Planning Policy Guidance and building regulations, drainage and waste disposal approved document H provides a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Connection to a private sewer, communicating with a public sewer,
3. Either a septic tank or another wastewater treatment system,
4. A cesspool

This will ensure that developers do not attempt to use other drainage systems to overcome the capacity issues if they are not appropriate.

### **Flood Risk**

The main river Lothingland hundred and tributaries lies along the boundary of Mutford. Due to this part of Mutford falls within flood zones 2 and 3, which are known as the high and medium flood zones. The Neighbourhood Plan does not allocate any new development within this area, however, it should be included that any future development within flood zones 2 and 3 should be accompanied by a Flood Risk Assessment. The development should also ensure it does not increase flood risk elsewhere.

We note that in section 4 point 18 there is reference to tree planting to help reduce flood risk. We welcome natural flood management schemes, any proposed tree plantation or habitat building within 8 meters of a main river may require a Flood Risk Activity Permit and contact with our agency should be made at the earliest point to discuss this.

### **Natural Capital**

Studies have shown that natural capital assets such as green corridors and green amenity spaces are important in climate change adaptation, flood risk management, increasing biodiversity and for human health and well-being. An overarching strategic framework should be followed to ensure that existing amenities are retained and enhanced.

Development management will guide the provision of green infrastructure which should be delivered in a collaborative approach between developers, councillors and the local community. SuDS are often part of building green infrastructure into design. For more information please visit <http://www.susdrain.org/delivering-suds/using-suds/background/sustainable-drainage.html>

Please note that the view expressed in this letter by the Environment Agency is a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.

### **Ground Water**

Mutford lies over a principal and Secondary Aquifer. For land that may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information should be provided with any planning application to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment (including a desk study, conceptual model and initial assessment of risk), and provide assurance that the risk to the water environment is fully understood and can be addressed through appropriate measures.

## Historic England

Thank you for your correspondence dated 26 April 2019 inviting Historic England to comment on the Regulation 16 Submission version of the Mutford Neighbourhood Plan.

We welcome the production of this neighbourhood plan, and are pleased to note that the historic environment of the parish is referred to throughout. Aside from congratulating those involved, we do not wish to provide detailed comments at this time. We would refer you to any previous advice submitted at Regulation 14 stage, and for any further information to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment.

# Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the submission version of the Mutford Neighbourhood Plan.

SCC responded to the pre-submission consultation with recommended changes to the plan and notes that the issues raised are addressed in the submission draft of the plan.

Therefore, the county council has no additional comments to make.