



## Bungay Neighbourhood Plan Referendum

# Summary of Representations

*Note: this document was updated on 11th October 2022 to correct a minor wording error.*

This document contains summaries of the representations made in response to the publication of the Submission Bungay Neighbourhood Plan which was held between 11<sup>th</sup> April and 6<sup>th</sup> June 2022. The full representations were submitted to the Examiner for consideration during the Examination of the Bungay Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

[www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/bungay-neighbourhood-area/](http://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/bungay-neighbourhood-area/)

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East Suffolk Council	<p>The Council consider the Plan a well written document and is pleased with the positive approach taken to housing. The Council supports the plan and it's aims.</p> <p>Para. 31, 2nd sentence: 'This contains planning policies for the whole of the <b>former</b> Waveney part of East Suffolk District, including Bungay...'</p> <p>Policy H3, final para. criterion B seems to aim for first homes exception developments that relate strongly to the built-up area. This could be achieved by using policy wording such as 'adjacent', 'abutting', 'forming a strong, positive relationship with', or 'resulting in a continuous pattern of development'.</p> <p>In many areas the landscape around Bungay is sensitive and a 50m allowance in Policy H3 throughout the plan area could allow developments that needlessly separated from the settlement boundary and detrimental to the landscape. The concern is there is no underpinning evidence and justification that a 50m allowance is required for an effective policy.</p>

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	<p>Para. 60 The Council's Housing Enabling team can share housing need data to guide the delivery of older person's housing such as bungalows or sheltered housing.</p> <p>Para. 66 Please clarify what are 'middling incomes'.</p> <p>Para. 67 Reference should be made to First Homes being required to account for at least 25% of all affordable housing units delivered by developers through planning obligations, as stated in National Planning Practice Guidance.</p> <p>Para. 68 Final sentence: The plan should reflect that the Council has produced the indicative housing requirement figure of 67 dwellings.</p> <p>Para. 71 2nd sentence: infrastructure capacity issues will not be managed by the district Council.</p> <p>Para. 79 This part should reference the submitted 'Bungay Indicative Housing Requirement' document.</p> <p>Policy H3 identifies a very high need for affordable rented homes and the policy requires 90% of Affordable homes to be provided as affordable rent. However, the final para. of the policy allows only for First Homes to be provided. Restricting exceptions sites to First Homes seems incongruous with the identified high need for affordable rented homes.</p> <p>Reference is made in the neighbourhood plan; Consultation Statement; and submitted SEA Environmental Report to a call for sites carried out by the neighbourhood plan group in 2020. The neighbourhood plan and the supporting documents should be clearer and provide more comprehensive information around their call for sites as evidence of a robust process.</p> <p>Policy H4</p> <ul style="list-style-type: none"> <li>• Criterion a: Masterplanning for this site and the neighbouring WLP5.2 site is supported. However, if site WLP5.2 is permitted/delivered ahead of this site then joint masterplanning may not be possible and the criterion should include some flexibility.</li> <li>• Criterion d: house size is already addressed under policy H3 – it is not necessary to repeat it here.</li> <li>• Criterion e: Vehicular access from St Johns Hill is viewed as the only appropriate access for this site.</li> <li>• Criterion m: "...a transport statement or assessment" is vague and is already addressed by policy WLP8.21 of the Waveney Local Plan. This text should be removed.</li> </ul>

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	<p>The land allocated for housing by policy H4 requires access across more than one site, including over third party land. The neighbourhood plan and/or supporting documents should provide clear evidence of suitable access arrangements.</p> <p>Para. 84 The neighbourhood plan cannot allocate district level CIL. This paragraph should be clarified accordingly.</p> <p>The first part of Policy TC&amp;E1 is not policy and should be removed.</p> <p>Para. 127 seems out of place and may be better placed after the policy but before Community Action 2. Or sections 9.1 or 9.3 could provide a home for it.</p> <p>The submitted SEA Environmental Report identifies mitigation for policy TC&amp;E2, in paragraph 181. The wording of TC&amp;E2 could be interpreted to not apply to hotels and give a more permissive approach. ESC advise that the policy is instead set out in two parts, the first clearly relating to non-hotel development and the second setting out that new hotel development would only be supported in the town centre.</p> <p>Policy ENV1</p> <ul style="list-style-type: none"> <li>• The supporting text for ENV1 and TM4 refer to the green corridor being used for people to walk and cycle in, but ENV1 only refers to habitat improvements and links for wildlife. The policy should clarify what the Green Corridor should be achieving and how a decision-maker or applicant/agent should apply this policy.</li> <li>• It is not clear if the policy should be applied rigidly to all development falling within the corridor shown in fig. 6, or if it should be applied more flexibly to developments in the region of the corridor in fig. 6. This makes it unclear how the policy should be applied by applicants/agents and decision-makers.</li> <li>• It is unclear if there are suitable means available to deliver biodiversity net-gain in the green corridor. There should be some flexibility in case some or all biodiversity net-gain can not be satisfactorily delivered in the green corridor. The final sentence of the policy is very aspirational and lacks clarity and precision, therefore it may work better as a community action rather than planning policy.</li> </ul> <p>Typo in final sentence in para. 144. Replace 'contained' with 'contain'.</p> <p>Is policy ENV2 necessary as biodiversity net gain is addressed in ENV4? If retained the policy needs clarity regarding whether biodiversity net gain should apply to the open space of new development as a whole.</p>

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	<p>Criterion a of policy ENV4 does not explain how existing biodiversity should be assessed and how gain should be calculated.</p> <p>In policy ENV5 text should be added: “use of <b>hard-surfacing</b> materials”.</p> <p>In TM2, criterion a) it is unclear how existing demand and forecast future demand is expected to be measured and calculated. This element of the policy should either be made more precise or removed.</p> <p>In TM2, criterion B the reasoning behind the criterion and how it should be applied are unclear. Clarity should be provided or it should be removed as it would lack the clarity and unambiguity required by para. 16 of the NPPF</p> <p>The first para. of TM4 discusses creating movement routes in the green corridor in fig. 6. However, this is not referenced in the policy for the green corridor. Policies ENV1 and TM4 should be aligned in their objectives if both movement routes and wildlife/habitat improvements are to be achieved. One or both of the policies should be re-worded.</p> <p>The final para. of TM4 reads like a community action. Suggested alternative wording for the policy: “the implementation of a new cycleway and pedestrian route connecting any major development to the west of St John’s Road to Flixton Road in order to increase access to Stow Fen will be strongly supported.” This could also form a separate community action if the steering group wished.</p> <p><b>SEA Environmental Report March 2022</b></p> <p>The Council provided comments on the SEA in response to the Regulation 14 consultation where the SEA Environmental Report dated July 2021 was published. The Examiner should note that the SEA comments included in the submitted Consultation Statement are those which the Council provided in March 2022, after the Regulation 14 consultation, as part of its feedback on the draft Regulation 15 Submission documents. The Council’s comments on the July 2021 SEA Report include comments in relation to how the alternative site had been assessed and the approach to consideration of alternatives, as well as a number of other more detailed points. In order for the Council to support the preparation and implementation of the Neighbourhood Plan, the SEA Report should provide a full and robust assessment of the plan and alternatives.</p> <p>The current wording of TC&amp;E2 could be interpreted as meaning that the requirements in the policy do not apply to hotels, and therefore that a more permissive approach is taken for hotels. Given the mitigation set out in para. 181 of the SEA this is not thought to be the intention of the policy. The Council advise that the policy is instead set out in two parts,</p>

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	<p>the first clearly relating to non-hotel development and the second setting out that new hotel development would only be supported in the town centre. As a minor point related to this, paragraphs 132 and 144 of the SEA appear to show the incorrect policy references (it is thought this should be TC&amp;E2).</p> <p><b>SEA Environmental Report July 2021</b></p> <p>In para. 8 it would be helpful to briefly set out the context within which alternative options were considered. The difference between 65 and 70 dwellings is marginal in SEA terms. The Planning Practice guidance on Strategic Environmental Assessment states “Reasonable alternatives are the different realistic options considered in developing the policies in the plan. They need to be sufficiently distinct to highlight the different environmental implications of each so that meaningful comparisons can be made.” (Ref Paragraph: 038 Reference ID: 11-038- 20190722). There should be an explanation as to why the alternatives have been chosen, with reference to how potentially suitable sites have been identified. Are these the only sites deemed suitable through the site assessment work?</p> <p>Paragraph 18 – It isn’t clear how the refusal for 40 dwellings on the site renders it a less preferred option. It is noted later on in para 67 that planning permission has previously been refused on flood risk grounds but that there is 0.2ha outside of the flood zone. If it is considered unsuitable arguably it is not a reasonable alternative.</p> <p>Paragraph 23 – the ‘recommendations’ would normally be described as mitigation measures, and it would therefore be helpful for the word mitigation to be used somewhere in this sentence.</p> <p><b>Introduction</b></p> <p>Paragraph 32 – It would be more accurate to refer to the fact that screening was undertaken that identified the potential for significant effects and therefore a full SEA is required.</p> <p>Paragraph 33 – for completeness the Regulations should have “(as amended)” afterwards.</p> <p>Paragraph 35 – whilst an SEA report will most likely answer these three questions they are not specifically questions that are required to be answered by legislation, so it may be better to say something along the lines of “The Environmental Report sets out information to meet the requirements of the Regulations and sets out information in relation to the following questions”.</p> <p>Paragraph 37 refers to questions in paragraph 7, should this be paragraph 35?</p>

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	<p>Paragraph 43 – I think the 72 dwellings referred to are those identified in the Local Plan in paragraph 5.2 “The Local Plan allocates land for 485 new homes (of which 150 already have planning permission) in addition to the 72 on unallocated sites which already have permission or completed since the beginning of the plan period.” This data is as at 31.3.2017, and this should be made clear in this paragraph.</p> <p>Paragraph 43 - The indicative housing requirement provided by East Suffolk Council is 67 dwellings. It could be helpful to put this in to some context by referencing the methodology paper that the Council has adopted for assessing indicative housing requirements.</p> <p>Paragraph 44 – should this state that the indicative housing requirement for the part of the Neighbourhood Plan area in the Broads is zero?</p> <p>Paragraph 49 – At the draft Scoping Report stage air quality was scoped out. We commented that this didn’t reflect the discussion that new development could give rise to increased levels of NO2. It is noted from the summaries in Appendix B Scoping Information that the statutory consultees did not raise this, however it is noted that it remains scoped out contrary to our earlier advice.</p> <p>SEA Framework Historic Environment – as per previous comments, does Bungay currently have Non Designated Heritage Assets that have been formally identified as such? It is noted that the Plan does not propose any, but have they been identified through the Buildings of Bungay Archive? If there are not any already the role for the SEA would be to assess the impacts of proposing NDHAs rather than assessing the impacts of the Plan on NDHAs.</p> <p>Paragraph 59 – it would be worth also referring to the PPG as this provides a further explanation on what is expected by assessing alternatives.</p> <p>Paragraph 63 – For accuracy this should state that the Local Plan allocates land for approximately 485 homes.</p> <p>Paragraph 64 – See comments above under paragraph 43.</p> <p>Paragraph 65 – where are the sites that were unsuitable? It would be helpful to cross refer to any site assessment reports. The sites have been identified through the Waveney call for sites in 2015 and it would be helpful to reference any work that has been undertaken to establish whether the site are still available. This may be more of an issue for the</p>

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	<p>Neighbourhood Plan more generally but there are links with the SEA and assessing reasonable alternatives.</p> <p>Paragraph 71 – these alternatives do not appear sufficiently distinct and should be more clearly explained. A more distinct approach could involve assessing a greater reliance on windfall and a smaller allocation for example.</p> <p>Assessing reasonable alternatives – it would help to assess each alternative specifically against each of the SEA objectives and questions. This would ensure it is clear that all questions have been covered. It also isn't clear whether both sites have been assessed individually against the SEA framework, as full assessments are not included in the report.</p> <p>Paragraph 73 – would 'judgements' be a better word than 'assumptions'?</p> <p>Paragraph 77 – The sentence stating that the trees in the north east part of the site should be retained is mitigation rather than part of a positive assessment. In other words uncertain or negative effects would be recorded with this identified as potential mitigation.</p> <p>Paragraph 90 – Given that the difference on BNDP04 is only five dwellings between the 2 options and the site area is assumed to remain the same, would option 2 really mean less agricultural land is lost?</p> <p>Paragraph 101 – Option 2 would deliver slightly less affordable housing as the site BNDP03 is below the 11 dwelling threshold set out in policy WLP8.2 and therefore wouldn't be required to deliver any affordable housing.</p> <p><b>What are the SEA findings at this stage?</b>            Paragraph 119 – typo in first line 'accurately'.</p> <p>Appraisal of the Bungay Neighbourhood Plan – are there assessments for each policy to help see how each policy performs against the SEA Framework objectives and questions set out in Figure 2? The discussion seems very weighted towards the positives of the policies – it may be that it is largely positive effects that are recorded but without a policy-by-policy assessment it is not possible to be certain.</p> <p>Paragraph 132 – If the reference to opportunities to mitigate emissions is mitigation being recommended by the SEA it should be clearly set out as such. This is the case for any mitigation that is recommended.</p> <p>Paragraph 140 – It would be acceptable to refer to a relevant Local Plan policy, in this case WLP8.24 Flood Risk, as mitigation, as the</p>

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	<p>Neighbourhood Plan is not expected to repeat policies that are covered in the Local Plan.</p> <p>Paragraph 170 – It should be clear that the recommendations are mitigation. This list doesn’t seem to cover all of the mitigation identified in the discussion above, such as in paragraph 132 in relation to emissions. As it appears the mitigation listed here has been incorporated in to the draft Plan, this should be stated here.</p> <p>Habitats Regulations Assessment – Has the appropriate assessment been undertaken? The results of this should be reflected or at least referenced in the SEA assessments in response to the first question under the Biodiversity theme.</p> <p><b>What are the next steps</b>            Paragraph 172 – last sentence – the basic condition relates to being in general conformity with the strategic policies of the Local Plans.</p> <p>Paragraph 174 – although the reporting of monitoring of significant effects could take place through East Suffolk Council’s Authority Monitoring Report, the SEA itself should establish what needs to be monitored and what the indicators would be based on the significant effects identified.</p> <p><b>Appendix B – Scoping Information</b>            As air quality was scoped out at the scoping stage, the relevant baseline and information and reasons for scoping it out should be included here for completeness. Our advice however remains that it would have been more robust to have included air quality (as per our comments on the Scoping Report).</p>
<p>Alan Pearmain</p>	<p>Suggests a new Medical Practice to compete with the existing because the parking at the existing Practice needs to be increased which is impractical. Suggests a new Practice in Ditchingham.</p> <p>Feels that the Community Infrastructure Levy should not be used for sport or green spaces, but used for more needed schemes, such as footpaths. He considers spending on sport and then trying to convince people to use them wasteful.</p> <p>Endorses the taking over of Skinner’s Meadow. Suggests insisting the current building is refurbished.</p>
<p>Broads Authority</p>	<p>Figure 1 needs to show the Broads.</p> <p>Supports para. 49 stating the design guide does not apply to the Broads.</p>



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	<p>Policy H1 para. 1, 2, the criteria (a) to (n), and sentence 1 and 2 of last para can apply to the Broads.</p> <p>In policy H1 recommend using a different word to navigation which has a different meaning in the Broads.</p> <p>Para 61 needs to refer to the Broads' equivalent standard for M(4)2, for completeness.</p> <p>In para 64 the Local Plan for the Broads also covers rural exception sites.</p> <p>Policy H3 could say that First Home Exception Sites are not permitted in the Broads.</p> <p>In figure 5 the legend does not match what is on the map and it could show the site allocated in the Waveney LP for context.</p> <p>Para 87, does not read well. Delete the word 'centre'?</p> <p>In para. 144 replace 'contained' with 'contain'.</p> <p>In policy ENV3 should the areas be mapped so it is clear what area the policy applies? What about the Broads in general, given that the NPPF protects the Broads and its setting? What is an acceptable impact on these areas?</p> <p>Policy ENV5 uses the term 'natural' but not all SUDs are natural, such as permeable driveways are not natural.</p>
Historic England	<p>They have reviewed the plan and relevant documentation and do not consider it necessary to provide detailed comments.</p> <p>They refer people to their Regulation 14 stage comments.</p> <p>They wish to be notified when the Neighbourhood Plan is made by the council.</p>
Ken Lodge	<p>Mr Lodge was the chair of the Bungay NDP group for four years until April 2020.</p> <p>Claims the time taken to progress the plan is unacceptable and caused mainly by planning officers. Regards COVID as an excuse. Found the whole process of developing the plan cumbersome and off-putting.</p> <p>He supports the neighbourhood plan.</p>

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	<p>The Waveney Local Plan allocates housing on site WLP5.1 opposite the swimming pool which he does not consider this appropriate. It is claimed it will cause increased water run-off into the Tin River and cause more flooding downstream. It is claimed that an attenuation pond provided is insufficient to deal with increased water run-off as the plan triples the number of homes in the locations of Local Plan allocations WLP5.1 and WLP5.2. Future planning should take surface water and river/sea levels into account.</p> <p>The old drainage system in the town mixes both sewage and surface water which is not recommended and would no longer be allowed. Small and individual developments may exacerbate an already poor system to deal with water.</p> <p>Local planning should take into account all aspects of infrastructure, which often seems not to be the case.</p>
Natural England	Natural England does not have any specific comments on this Bungay Neighbourhood Plan Regulation 16 Consultation
Norfolk and Waveney NHS Integrated Care System (NHS Norfolk and Waveney Clinical Commissioning Group)	<p>The Bungay Medical Centre serves circa 11,400 patients from the town and surrounding villages. The Bungay Surgery utilises the James Paget Hospital for most of its secondary care, East Coast Community Healthcare provide community nursing and therapy services for Bungay, and Norfolk and Suffolk NHS FT cover patients mental health needs, with many of these services delivered into patient’s homes, remotely or from central resources, whilst the East of England Ambulance Service NHS Trust provide emergency response to the area.</p> <p>Bungay is serviced by Bungay Medical Centre. Any current capacity will quickly be consumed by new developments in the area. The PCN are looking at ways to better integrate with the community teams with Primary care provision.</p> <p>They recognise and support the need for infrastructure and service improvements and welcome the proposed plan, with particular focus on the following objectives and comments set out in the neighbourhood plan: page 12 - Objective 1, page 12 - Objective 2, page 15 para. 42, page 30 para. 80 and page 31 para. 86.</p> <p>They welcome point 94 on page 32 regarding the use of CIL to help mitigate the impact of planned growth on the Healthcare provision/services in Bungay. The exact nature of the contribution and expenditure by health care providers will need to be calculated at an appropriate time.</p>

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	<p>They would welcome the addition of a statement confirming Bungay Town Council still support ICS in ensuring suitable and sustainable provision of Healthcare services for the residents of Bungay, as part of objectives 1 and 2.</p> <p>If unmitigated, the impact of developments on healthcare within the Bungay neighbourhood would be unsustainable, including that of Primary Care, Community Care, Mental Healthcare, and the Acute Trusts.</p>
<p>River Waveney Trust</p>	<p>Outney Common could be improved and managed primarily for conservation alongside carbon sequestration, pollution reduction and amenity. The River Waveney Trust have started talks with commoners about practices that are damaging to wildlife.</p> <p>New housing should ensure clean rainwater does not enter the sewage network. Raw sewerage is regularly entering the River Waveney. Developers should be required to have no further impact on the issues. Water companies cannot take the whole burden of separating clean and dirty water, this should be done at source.</p> <p>Whilst ‘nutrient neutrality’ doesn’t apply to Bungay, the guidance should be followed, as the River Waveney suffers from nutrient overloading and new developers will add to this.</p> <p>Strongly supports further access to the River Waveney through CIL.</p> <p>Agree access to the countryside is limited, especially to the river and would like to see more permanent access. They believe new ELMS schemes should be used to look for financial incentives for landowners to do this.</p> <p>Very strongly support the proposal to use Skinners Meadow for a publicly accessible green corridor. The Tin River here would benefit from restoration and a project to connect residents and land with the river and the river has the potential higher up the catchment area to be designed to incorporate natural flood management. The surrounding landscape has little potential to hold back water in times of high rainfall and most slopes are intensively drained arable land which adds to the issues of flooding. The Trust would be very interested in being involved with river restoration and community engagement with the river.</p>
<p>Suffolk County Council</p>	<p>SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage</p> <p>The County Council’s response focuses on matters related to the Basic Conditions, that the plan needs to meet to proceed to referendum.</p>

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	<p>Several of the comments and suggested amendments provided by the County Council during the Reg14 consultation have not been discussed in the published Consultation Statement.</p> <p>During the pre-submission consultation, SCC raised that the plan was factually incorrect in section 7.2, which refers to the National heritage List for England. The National Heritage list that Historic England maintain referenced here is currently being integrated into the Suffolk Historic Environment Record (HER). The Plan should note the HER is held by SCC with records viewable on the Suffolk Heritage Explorer at <a href="https://heritage.suffolk.gov.uk/">https://heritage.suffolk.gov.uk/</a>.</p> <p>In section 7.2 the following wording is requested to be added: <i>“Suffolk County Council manages the Historic Environment Record for the county. Non-designated archaeological heritage assets would be managed through the National Planning Policy Framework. Suffolk County Council Archaeological Service advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework, East Suffolk Core Strategy (Strategic Priority 15) and Waveney Local Plan (policy WLP8.40) are met. Suffolk County Council Archaeological Service is happy to advise on the level of assessment and appropriate stages to be undertaken.”</i></p> <p>SCC is concerned about the use of “where reasonable” in the opening sentence of Policy ENV4 Biodiversity. It potentially reduces the weight given to protection of the natural environment in para. 174 of the NPPF. SCC recommends the phrase is removed to meet basic conditions and align with national policy.</p> <p>SCC noted during pre-submission and East Suffolk Council noted during the informal “health check” that views were mentioned in the plan but not in any policies. Policy H4 and CH1 refer to important key views but none are identified in the plan.</p> <p>SCC believes reference to key views without being specifically defined in policy, is unclear and para. 16 of the NPPF requires policies to clearly written and unambiguous. To provide clear guidance for developers and decision makers, and to remove ambiguity, the plan should state explicitly where the key/important views are and identify these on a map.</p> <p>SCC noted during pre-submission that it would be better to refer to “public rights of way network” not “expanded cycling and footpath</p>

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	<p>network” in policy TM4. Amending the wording provides flexibility to allow access for pedestrians, cyclists, equestrians, and mobility vehicles/wheelchairs on bridleways.</p> <p>The designations of Public Rights of Way are as follows:</p> <ul style="list-style-type: none"> <li>• Footpath: access for pedestrians only</li> <li>• Bridleway: access for pedestrians, cyclists, and horse-riders</li> <li>• Restricted Byway: access for all of the above, and horse-drawn vehicles (nonmotorised)</li> <li>• Byway Open To all Traffic (BOAT): all of the above, and motorised vehicles.</li> </ul> <p>SCC notes para. 100 of the NPPF states policies should “protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users”.</p>
<p>Waveney, Lower Yare and Lothing Internal Drainage Board (Water Management Alliance)</p>	<p>The Parish of Bungay is partially within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB).</p> <p>The Board’s website: (<a href="https://www.wlma.org.uk/uploads/WLYLIDB_Index_Map.pdf">https://www.wlma.org.uk/uploads/WLYLIDB_Index_Map.pdf</a>) for detailed mapping of each Board’s District, specifically catchment CMT275G and which watercourses have been adopted here: (<a href="https://www.wlma.org.uk/uploads/WLYLIDB_CMT275G-EllinghamBungay.pdf">https://www.wlma.org.uk/uploads/WLYLIDB_CMT275G-EllinghamBungay.pdf</a>)</p> <p>The adoption of watercourses by the Board is an acknowledgement that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB. Maintenance is not necessarily carryout annually and there is no requirement for any formal maintenance and no change in ownership or liability associated with the watercourse.</p> <p>For any development within the Board’s district the Board’s byelaws apply. The Byelaws for the Board are available on the development pages of our website (<a href="https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf">https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf</a>).</p> <p>Consent is required to discharge surface water into a watercourse within the IDD. Consent will likely be conditional and require a fee. Works within 7m of Board adopted watercourse or within 7m drainage or flood risk infrastructure require consent. This is to ensure the Board can maintain watercourses without restrictions to access and ensure operatives are aware of third party structures when undertaking maintenance.</p>

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	<p>Proposal to alter watercourses, include culverting for access, then Land Drainage Consent is required under Section 23 of the Land Drainage Act 1991. If inside the IDD then the IDB would be the consenting authority. If outside the IDD, then Suffolk County Council (Lead Local Flood Authority) would be the consenting authority.</p>