Updated Responses to Easton Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 10 November 2023 to 19 January 2024

February 2024



Updated Responses

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This document contains responses from Anglian Water and the Environment Agency received after the closing date of 5pm on Friday 19 January, which updates the Anglian Water and Environment Agency responses received before the consultation closing date.

The only difference between the original Environment Agency response and the updated Environment Agency response is the replacement of the 'River Fynn' with 'River Deben' in the first paragraph under the 'Flood Risk' subheading.

A separate document entitled 'Responses to Easton Neighbourhood Plan' contains all responses received during the consultation period 10 November 2023 to 19 January 2024.

Anglian Water (updated response)

I've consulted colleagues on whether the development of 14 homes in Easton was included in the population forecast for 2021 in the DWMP, our investigations conclude that at that time, only 3 of the 14 properties were included (based on billing information at that time).

Any implications for capacity at the WRC will be considered by our pre-development team at the application stage and we would recommend that the applicant undertakes early engagement with Anglian Water. If investment is required, then this could delay development coming forward, as potential solutions are evaluated. Investment in upgrading our WRC's is not a process that developers are involved with or have any influence over in terms of future housing growth. The funding for this investment comes from customer bills and our budget is set and approved by Ofwat at five yearly intervals through our business planning process.

The policy could include a criterion which requires early engagement with Anglian Water to ensure that there is adequate capacity, or capacity can be made available.

Environment Agency (updated response)

Thank you for consulting us on the pre-submission plan for the Easton Neighbourhood Plan.

We regret that at present, we are unable to review this consultation. We have had to prioritise our limited resource and must focus on influencing plans where the environmental risks and opportunities are highest.

For the purposes of neighbourhood planning, we have assessed those authorities who have "up to date" local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.

A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.

Environmental Constraints

We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:

Flood Risk

Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area. In particular, we note that the boundary does extend into areas of Flood Zones 2 and 3 of the designated main River Deben.

On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. <u>National Planning Policy Framework</u> (NPPF) paragraph 167 sets this out.

Water Resources

Part of the neighbourhood plan area falls partly within an area subject to a memorandum on non-residential development set up by Anglian and Essex water companies. In this area they are not able to guarantee supply of water to any new economic development. This will likely impact the feasibility of any proposed or future economic development in your neighbourhood plan area.

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process) - GOV.UK (<u>www.gov.uk</u>).

Informatives

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <u>How to consider the environment in Neighbourhood plans -</u> Locality Neighbourhood Planning

Source Protection Zones

Your plan includes areas which are located on Source Protection Zones 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: https://www.gov.uk/government/collections/groundwater-protection