

Appendix J: responses from statutory undertakers and Suffolk County Council

Settlement & site ref	SHELAA status	Summarised comment	Response	Action
Environment Agency				
All sites	<p>The East Anglia Area Pre-Application Planning Advice Guide is attached to the EA response. The guide contains basic information and links to the type of environmental issues the EA expect to be considered as part of a planning application and as part of the site selection process for local plans.</p> <p>“Unfortunately, we do not have the resources to screen all the 732 sites included within the draft SHELAA for free. The attached guidance has been provided to you to enable you/ site promoters to identify the key environmental issues for each site.”</p>	<p>Noted and thank you.</p> <p>The SHELAA does not allocate land for development or give planning permission to allow the development of a site.</p> <p>West Suffolk is preparing a local plan and a key part of the evidence base will be the Strategic Flood Risk Assessment and Water Cycle Study that is being commissioned.</p>	<p>We will be working with the Environment Agency, Anglian Water and Suffolk County Council to ensure that all aspects of water supply, surface water drainage, flood risk and waste-water are fully considered when moving forward with the local plan.</p>	
Historic England				
All sites	<p>We welcome the substantial work you have undertaken in preparing this document. We do not have the capacity to consider every site in your assessment, and have therefore</p>	<p>Noted and thank you.</p> <p>The SHELAA does not allocate land for development or give</p>	<p>No further action required at this time.</p>	

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		<p>focussed our comments below on how the historic environment might be most effectively assessed as part of the SHELAA methodology.</p> <p>The standard SHELAA methodology identifies that heritage conservation is a factor when assessing a site's suitability for development now or in the future (Planning Practice Guidance). Historic England advocates that, when using this methodology, a wide definition of the historic environment is used. This includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important. In addition, it includes the landscape and townscape components of the historic environment, as well as archaeology, the importance and extent of which is often unknown and may extend beyond designated areas. Information in the Historic Environment Record (HER) may indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made. The possible cumulative impact of a number of site allocations in one location could also cause considerable harm to the historic landscape/townscape.</p>	<p>planning permission to allow the development of a site.</p> <p>The upcoming West Suffolk Local Plan will set out a strategy for growth within West Suffolk and allocate land for housing and economic development.</p> <p>We will consider these comments and take further advice when moving forward with the local plan.</p>	

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		Historic England has produced advice on site allocations (link provided). The remainder of the response refers to site allocations.		
National Grid				
Red Lodge				
WS455 WSE04 WS208 WS451	Deferred housing Included economic Included housing Deferred housing	National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. The four sites in Red Lodge have been identified as being crossed or in close proximity to National Grid infrastructure: Asset: FM03 - Roudham Heath to Gt Wilbraham; Appendix Ref GT127. Appendix 2 provides maps of the sites referenced above in relation to the affected National Grid Transmission assets. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation,	Noted and thank you. Reference to the high-pressure pipeline has been included within the included sites proforma.	Reference to the high-pressure pipeline has been included within the included sites proforma.

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		<p>alteration and review of plans and strategies which may affect National Grid's assets.</p> <p>Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database (<i>consultant appointed by National Grid</i>).</p>		
Natural England				
All sites	<p>We recognise that SHLAAs form a critical component of the evidence base for Local Plans. In order to allocate the most appropriate sites to deliver high quality, sustainable development, environmental issues and opportunities should be considered as an integral part of the assessment process.</p> <p>Natural England does not have available staff resources to provide bespoke advice on SHLAAs or attend meetings in connection with them. In line with the National Planning Policy Framework (NPPF), we offer the following generic advice on key natural environment considerations for use in producing or revising SHLAAs, which we hope is of</p>	Noted and thank you. We will continue to work with Natural England on the matters raised when preparing the West Suffolk Local Plan.	No further action required at this time.	

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		use. Advice set out under the following five headings: landscape; biodiversity; geological conservation; Best and Most Versatile Agricultural Land; public rights of way and access.		
RSPB				
Sites in three parishes/locations identified	Included housing	<p>Thank you for consulting the RSPB on the West Suffolk SHELAA draft report. Our comments on the suitability of sites mainly relates to potential negative impacts on breeding stone-curlews. Stone curlews have a low tolerance for disturbance, making them particularly sensitive to housing development. They can be displaced from an area of up to 2km radius from housing developments and are also known to avoid areas of up to 1.5k from major roads.</p> <p>We support the deferral of all sites within the Breckland SPA, SAC, and stone-curlew constraint zone.</p> <p>The Included Housing sites (1-3) are close to areas where stone curlews are known to breed, but outside of the Breckland SPA and stone-curlew constraint zone. Given the proximity of stone curlews (in these locations) to the</p>	Noted and thank you.	No further action required at this time.

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One economic site identified	Included economic	<p>Breckland SPA, we consider that these birds are likely to form part of the SPA population (i.e. this area should be considered functionally linked to the SPA). Due to this, any potential impacts on these birds should be considered through a Habitats Regulations Assessment under the Conservation of Habitats and Species Regulations 2010 (as amended). In addition, development proposed in these locations will require a Screening Opinion to determine whether an EIA is required.</p> <p>This included economic site is close to a separate small population of stone-curlews.</p> <p>Should allocations be considered in the above areas (1-4), the potential presence of stone curlew should be noted as a constraint and developers required to incorporate stone curlews into desk-based data searches and site-based surveys to inform the relevant assessments. The RSPB can provide data and survey advice on request.</p>		
West Suffolk Commissioning Group				

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All sites		<p>The CCG understands that the SHELAA is a working document and numbers will change as the process develops and when the local plan will be ready for comment but it is concerned with the expected yield in certain towns and large villages proposed. We hope that working together we will be able to plan so that healthcare will be ready for the numbers of patients expected.</p> <p>We as a CCG primarily has to look at the Primary Care provision and strategically plan, this is beginning to be done based on the SHELAA. It should also be recognised that housing increase will affect other NHS Trusts in the area and planning should incorporate this thinking going forward.</p> <p>The CCG would like to work closely with West Suffolk Council Strategic Planning Team in creating an Infrastructure Delivery Plan so that we can look at mitigating for the proposed population increase and subsequent increase in patient list size of GP practices already over capacity in the majority. Working together, we will be able to reassure the public that the housing strategy and NHS long-term view are aligned as to produce fit for purpose facilities in line with the increase in housing.</p>	<p>Noted and thank you. However, the SHELAA does not allocate land for development or give planning permission to allow the development of a site. The upcoming West Suffolk Local Plan will set out a strategy for growth within West Suffolk and allocate land for housing and economic development. We will continue to work with the West Suffolk Clinical Commissioning Group and other healthcare and infrastructure providers when moving forward with the local plan.</p>	<p>No further action required at this time.</p>

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Suffolk County Council				
		<p>Comments made in this response will be primarily related to county council service areas and will mainly focus on potential planning constraints for sites and providing baseline information on relevant infrastructure capacity.</p> <p>The county council is happy to discuss any of the information shared in this response and work with West Suffolk Council in the preparation of its Local Plan.</p> <p>Early Years: The county council organise early years provision by wards. In wards with deficits, residential development will be expected to contribute towards improved provision.</p> <p>Primary Education, Secondary Education and Further Education: The education requirements for each site will need to be considered and available school capacity may act as an infrastructure constraint or cost to development.</p> <p>Flooding and Water Management: The county council has performed a high level assessment of the flood risks on included SHELAA sites, using national fluvial and pluvial flood risk mapping and recorded flood incidents. The note below explains how sites have been categorised. This a desk-based assessment and does not take account of site planning histories.</p> <p>Blue corridors are distinct overland flow routes (or depressions), which during extreme rainfall will convey floodwater through the site. These should not be altered by development and should be retained or enhanced as to not put properties at risk.</p>	<p>Noted and thank you for a comprehensive response to the draft SHELAA.</p> <p>The information in the appendices provided by the SCC service areas will help with the detailed assessment of these sites as we move forward with preparing the West Suffolk Local Plan.</p>	<p>Other than where noted below, no further action required at this time.</p> <p>Flooding and Water Management 'High flood risk' assessment</p>

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		<p>Assessments of sites can be seen in Appendix 2. SCC can provide West Suffolk Council with GIS map data of SHELAA sites with flood risk data.</p> <p>Please note, where sites have been indicated as being at risk of flooding this does not necessarily apply to the whole site area and in some cases only a small area of a site may be at risk. Additionally, for some of the SHELAA sites more detailed information on flood risk may be available, such as sites where a planning application has been submitted or that are allocated in existing local plans.</p> <p>Note: The Flooding and water management desk-based RAG assessment has categorised risk as follows:</p> <p>Low flood Risk: The site has areas of surface water risk (either 30 year risk or 100 year risk). The site will require an FRA and identification of blue corridors.</p> <p>Medium Flood Risk: Both fluvial flood zone 3 and surface water risks are present in portions of the site. An FRA including, detailed modelling of river and surface water flood risks and identification of blue corridors will be required.</p> <p>High Flood Risk: Fluvial flood zone 3, 30 year surface water and 100 year surface water are risk is present on portions of the site. Site will require detailed water management consideration with an FRA which should include detailed modelling of river and surface water flood risks and identification of blue corridors. The sequential test will need to be applied.</p> <p>Minerals and Waste: The county council is the planning authority for Minerals and Waste and adopted minerals and waste plans form part of the development plan for West Suffolk. The current policy documents are the Waste Core Strategy and the Minerals Core Strategy, however it is expected that both of these documents will soon be superseded by the Suffolk Minerals and Waste Local Plan (SMWLP) Comments relating to minerals and waste planning policy will make reference to the SMWLP. To be clear, the presence of safeguarded resources or facilities near or within a proposed site does not necessarily preclude development, however this will need to be addressed in the emerging local plan. The county council is happy to advise on how the minerals and waste planning policy should be addressed in a local plan.</p>		<p>added to the site proformas. where appropriate.</p>

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<p>Minerals Resource Safeguarding: A list of included sites which fall within the MSA are in Appendix 3a including an approximation of the area of sand and gravel resource within the site.</p> <p>Minerals Facility Safeguarding: A list of included SHELAA sites within 250m of safeguarded facilities are in Appendix 3b.</p> <p>Waste Facility Safeguarding: A list of included SHELAA sites within 250m of safeguarded waste facilities are in Appendix 3c.</p> <p>Public Rights of Way: National planning policy requires that Public Rights of Way (PRoW) be retained and enhanced. Appendix 4 (supplied) presents desk based assessment identifying included SHELAA sites which contain PRoW and sites where PRoW form part of the site boundary. Should these sites be brought forward for development, either as a planning application or a local plan allocation, PRoW would be expected to be retained and if possible enhanced.</p> <p>Transport: Appendix 5 (supplied) presents a high level, desk-based analysis of sites, to establish the following information for each included SHELAA site of 20 dwellings or more:</p> <ul style="list-style-type: none"> • Presence of highway boundary; • Speed limit of presumed access roads; • If there is a history of collisions; • The distance to the nearest primary school (note, this may not be the catchment school); • The distance to the nearest secondary school; • If the site has an existing footway link; and • The distance to the nearest bus stop. <p>Sites which are currently within the development management process (i.e. have a submitted or approved application) have also not been assessed.</p>				<p>Archaeology advice added to the site proformas. where appropriate.</p>
<p>Archaeology: Archaeological potential of sites in the SHELAA provided in Appendix 6</p>			<p>Note: Appendices 1a and 1b, 2, 3a, 3b and 3c, 4, 5 and 6 are not attached here as they provide site-specific information that will require further analysis as part of the local plan process. We will continue to work closely with SCC during this process.</p>	

