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Suffolk Coastal District Council
Planning Policy
Council Offices Melton Hill
Woodbridge
Suffolk
IP12 1AU

Our ref: AE/2016/120947/01-L01
Your ref: *
Date: 24 October 2016

Dear Ms Hanslip

MELTON NEIGHBOURHOOD PLAN SEA SCOPING

Thank you for consulting us on this scoping exercise which we received on 7 October 2016. To ensure that the assessment will appropriately address the environmental issues we consider important for the area we are providing comments on:

Flood risk
The water environment
Soil
Foul water disposal
River basin management plan (RBMP)

Flood risk

Section 3.18 states that sections of the eastern part of the parish closest to the River Deben are classified as Flood Zone 3. This is the high probability flood zone, with an annual probability of flooding of 0.5% (1 in 200 chance). Some land is also classified as Flood Zone 2, the medium risk flood zone, with an annual probability of flooding of 0.1% (1 in 1000 chance) so it may be beneficial to include this in the text.

Table 5.1 showing sustainability objectives and criteria for the neighbourhood plan states 'Number of developments in 'highly vulnerable' or 'more vulnerable' flood risk areas'. This is not worded correctly; if the intention was to detail the number of developments in the areas at risk of flooding then this should instead be phrased as 'number of developments in Flood Zone 3 (high probability) and Flood Zone 2 (medium probability)'.

Or if the intention was to look at the number of 'highly vulnerable' developments (e.g. police stations, residential caravans etc.) and 'more vulnerable' developments (e.g. dwellings, short-let caravans etc.) in flood risk areas then a better wording would be 'number of highly vulnerable and more vulnerable developments in Flood Zone 3 (high probability) and Flood Zone 2 (medium probability)'. The vulnerability of a development is defined in Table 2 in the Planning Practice Guidance <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-2-flood-risk-vulnerability-classification/>

Melton is protected from tidal flooding by flood defences along the River Deben. However over time the flood levels will rise with the impacts of climate change, so the defences would not offer the same standard of protection. Consequently in the future the defences are likely to need to be improved and raised. This may require the defence to be widened, so it will be important to ensure that future development or activities do not restrict our ability to do this. It is also important to maintain our maintenance and repair access to the flood defence assets. Development that encroaches this access may not secure and permit for flood defence activities.

It would be beneficial if future development in Melton could contribute to the funding of future improvements to the flood defences on the River Deben.

As there are areas at risk of surface water flooding in Melton we recommend that you consult with the Lead Local Flood Authority Suffolk County Council.

The water environment

The section entitled "Water," page 19 and following may wish to make reference to the south of the area being situated over a Source Protection Zone 2 and across the whole area Principle and Unproductive Aquifers. These features will require future developments to put in place measures to protect the water environment.

Soil

Section 3.23 may wish to make reference to the area being a Nitrate Vulnerable Zone.

Foul water disposal

Development that proposes to dispose of foul water to the existing sewer network will increase the discharge loading from the receiving sewage treatment works which may have an adverse impact on the consented permit and subsequent water quality issues.

River basin management plan

Reference to the Anglian RBMP should be updated to refer to the latest information, data sets and targets, February 2016, <https://www.gov.uk/government/publications/anglian-river-basin-district-river-basin-management-plan>

We trust this advice is useful. The comments set out above are without prejudice to future decisions we make regarding any applications subsequently made to us for our permits or consents or future development proposals.

Yours sincerely

A handwritten signature in black ink that reads "Graham Steel". The signature is written in a cursive style with a large, prominent 'S' at the end.

Mr GRAHAM STEEL
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