

Babergh District Council
Stutton Neighbourhood Development Plan
Submission Consultation Responses

The Neighbourhood Working Group has examined the submission responses and wishes to make no comments on the following:

- Suffolk County Council
- Natural England
- Historic England
- National Highways
- Marine Management Organisation
- Defence Infrastructure Organisation, obo the MOD

With regard to Anglian Water consultation response we submit the following observations.

Anglian Water Consultation Response

Stutton Submission Neighbourhood Plan Reg. 16 Consultation

It is welcomed that Anglian Water is seeking positive environmental and social outcomes for our region.

The majority of comments made are supportive of the Neighbourhood Plan. This is welcomed.

This response deals with Anglian Water's comments which suggest changes to the Neighbourhood Plan.

Anglian Water's comments are reproduced in italics

Stutton Design Guidelines and Codes

Design Code EN.02.Low carbon development:

"We support this design code which includes ideal features such as water management and cooling with more ambitious water efficiency standards. This is an approach which we advocate as it helps to minimise the use of potable water and reduces the amount of water recycling required at our water recycling centres – saving water and energy. We suggest that the minimal requirements bullet point 6 should read "highly water efficient devices".

Design Guide Appendix 4 page 55

Point 6 currently reads "**Highly waste efficient devices** with low flow showers and taps, insulated tanks and hot water thermostats¹

We agree that this should be amended to read "**Highly water efficient devices**".

Design Code EN.07.SuDS:

“We support the approach taken in relation to SuDS and the opportunity to combine these with water storage and reuse options in an area of serious water stress. We would seek to clarify that when the text refers to ‘sewers’ that these are ‘surface water sewers’ to avoid misconnections to our foul water sewers. The text should refer to the drainage hierarchy to ensure the correct terminology is used. Surface water sewers generally drain to an ordinary watercourse as the water does not require treatment”.

The text currently reads

“Attenuation and controlled release, which holds back the water and slowly releases it into the sewer network. Although the overall volume entering the sewer system is the same, the peak flow is reduced. This reduces the risk of sewers overflowing. Attenuation and controlled release options are suitable when either infiltration is not possible (for example where the water table is high or soils are clay. Or where infiltration may be polluting (such as on contaminated sites).”

To acknowledge the comments made by Anglian Water we agree that the text should include the word surface before the word sewer as shown below.

- *“Where reuse is not possible there are two alternative approaches using SuDS: Attenuation and controlled release, which holds back the water and slowly releases it into the **surface** sewer network. Although the overall volume entering the **surface** sewer system is the same, the peak flow is reduced. This reduces the risk of **surface** sewers overflowing. Attenuation and controlled release options are suitable when either infiltration is not possible (for example where the water table is high or soils are clay. Or where infiltration may be polluting (such as on contaminated sites).”*

Policy SN9 Stutton Landscape and Settlement Character

“ We note that the Fringe Character Area 2 (FCA2) references the creation of Alton Water as a disruption to the valley landscape. Whilst this is a historically factual statement, the reservoir has been supplying water to the region for almost 50 years, and therefore can be considered a distinctive and embedded feature of the local landscape. Therefore, many residents will only have experienced the landscape with the reservoir”.

The Landscape Study - Aspects of value and heritage on page 29 reads

“The farmland has been organised first through parliamentary ‘late’ enclosure, and then through further 20th century amalgamation. Little of the ancient organic landscape remains and particular disruption to the valley landscape to the north is obvious with the flooding to form the reservoir”.

The report does not contradict the assertion that the reservoir is a distinctive and embedded feature of the local landscape. There are several references to the reservoir in the text and as such it is a significant element in the landscape within the area FCA2. It should be noted that one of the key views (9) overlooks the reservoir indicating the value placed on this ‘distinctive and embedded feature’.

However, given the comments from Anglian Water, should the examiner be so minded to require changes to this supporting document, it is proposed that the following text be added to the above sentence in the Landscape Study:

“although as it has been established for some 50 years, Alton Water is an embedded and familiar feature of the local landscape”.

“Given the intention of Policy SN9 and its reliance on the Landscape Study to inform future development proposals, we raise our concerns that the change management recommendation regarding further intensification of the leisure facilities could be interpreted to effectively propose ‘no further development’ at Alton Water”,

The Management Objectives as recorded on page 29 states

“Avoid, or effectively mitigate, impacts from further expansion of recreational or tourist related land uses at Alton Water in order to preserve landscape character and open views. Indirect impacts from recreational or tourist-related land uses must also be carefully considered, such as from increased traffic and effects on the rural tranquillity must also be fully assessed.”

Furthermore paragraph 7.20 page 31, the 6th bullet point reads

“Further intensification of visitor and tourist facilities or accommodation at Alton Water could have visual impacts as well as impact the prevailing tranquillity. Direct and indirect impacts should be considered carefully, appropriately designed belts of vegetation must be used to assimilate and screen views from the village edges.”

To address the concerns raised by Anglian Water it is proposed that the first sentence above be modified to read:

“Further intensification of visitor and tourist facilities or accommodation at Alton Water could have visual impacts as well as impact the sense of tranquillity which generally prevails.”

We do not accept Anglian Water’s concerns over the interpretation of policy SN9 and the Change Management recommendations in that they propose ‘no further development’ at Alton Water” .

Neither Policy SN9 nor the Management Objectives for FCA 2 propose that there should be no development at the reservoir. The focus is rather on **impacts** of development. As development can have potential impacts upon the landscape (and in addition other impacts on amenities of local people) the Policy and Management Objectives stress the need to fully evaluate those impacts. The Management Objectives, rather than ruling out development, suggest vegetation and screening schemes can mitigate or avoid the impact of development and therefore enable schemes to go ahead.

Moreover, there is further evidence within the Neighbourhood Plan which suggests that development on the Alton Water site can be supported. Chapter 8 Tourism and Leisure Policy SN14 Visitor and tourist development - page 71 reads:

“Developments that provide facilities or services for the visitor or tourist will be supported provided that they:

- demonstrate that they would conserve and enhance the landscape, heritage, character and appearance of the area.”

No further changes to the text are proposed.

Policy SN13 – Conserving and enhancing the Suffolk Coast and Heaths Area of Outstanding Natural Beauty

“ We recognise that the parish predominantly lies within the AONB and its setting. However, the policy corresponds closely to Policy SN9 in requiring a proportionate landscape assessment. It would therefore make sense to ensure these policies are more closely aligned to provide a more legible landscape policy approach for future applicants”.

The Plan specifically requires all proposed developments to carry out an assessment of landscape and visual impacts (proportionate to the scheme proposed), drawing on guidance and recommendations in the Stutton Landscape Study.

Any development that were to take place in the AONB requires the provision of a similar landscape assessment as that required under Policy SN9 and in that sense the two policies are already closely aligned. But Policy SN13 acknowledges that within the ANOB there are additional factors that need to be taken into account, including the most up to date Management Plan for the AONB.

It is not considered that a further alignment of policies SN9 and SN13 is necessary

Policy 14

We propose that the neighbourhood plan should acknowledge that the reservoir’s primary purpose is to supply water to the surrounding area, and therefore we may also need to carry out operational development in and around the lake shores to ensure that we are able to continue to provide vital water supplies to the region.

Irrespective of the role of the reservoir in providing a key water resource, if operational development is proposed which requires planning approval, the Neighbourhood Plan simply requires the impact on the landscape and the environment to be assessed. Should the local planning authority be required to determine a planning application for development at Alton Water it would be mindful of the policies contained within this Neighbourhood Plan as well as those of the appropriate Local Plan, which is likely to recognise the reservoir’s strategic and primary purpose of water supply. Protecting the valued and distinctive landscape and the amenities of the local community in accordance with the Landscape Study is an appropriate objective for the Neighbourhood Plan and does not clash with the reservoir’s primary purpose of supplying water.

No changes to the text are proposed.

Community Action 7 Working together with Anglian Water

Anglian Water welcomes the opportunity to work with the local community. We seek to enhance the visitor experience to Alton Water, including for local residents, and work to ensure that our water parks are a haven for wildlife and the perfect place for people to relax and get back to nature. They are a great place to take up new water-based sports and other recreational activities to improve health and wellbeing.

We welcome AW's preparedness to work with the local community. The focus of their comment seems to be based upon enhancing the visitor experience. Whilst this might form the basis for joint working the expectation from the local community is to address issues that impact adversely on their daily lives.

The Parish Council will seek to further joint working opportunities with Anglian Water

Policy SN20 Protecting Community Facilities.

We note that the play facilities at Alton Water are identified as a community facility within the policy and on Policy Map SN20. Whilst we recognise that the play area serves the local community, it is also serving tourists and day visitors as part of the wider regional water park leisure destination and therefore development at Alton Water is more appropriately guided under the neighbourhood plan Policy SN14 Visitor and tourist development.

Anglian Water make reference to the play facilities located at Alton Water reservoir and request that the text "and at Alton Water" be removed along with its reference in Map SN20.

The argument is that whilst the play area serves the local community it also serves tourists and day visitors as part of the wider regional water park destination.

This position is not disputed, however it is our contention that as the play area is of importance for people in the village. It therefore has an intrinsic value to the community and as such should be protected with the designation as indicated in Policy SN20.

No changes to the text in SN20, the Map SN20 and the Combined Policy Map on page 102 are proposed

Whilst Alton Water and its facilities are important in a regional context for recreation and leisure, they also play a significant role in the life of many local people. The play area, the water sports centre, café and more do serve the local community and can be seen very much as community assets. Whilst the Neighbourhood Plan has only sought to include the play area as a community asset we request the Examiner to consider including other facilities located at Alton Water as community assets that are worthy of the protection that Policy SN20 seeks to secure.