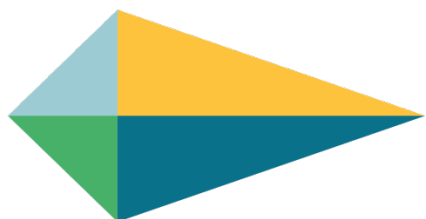


# Late Responses to Rushmere St Andrew Neighbourhood Plan

## Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 11 April 2022 to 6 June 2022

Published June 2022



**EASTSUFFOLK**  
COUNCIL

# Late Responses

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This document contains representations received after the closing date of 5pm on Monday 6th June.

A separate document entitled Responses to Rushmere St Andrew Neighbourhood Plan contains all representations received during the consultation period 11 April to 6 June 2022.

# Environment Agency

Thank you for the opportunity to comment on the Regulation 16 submission of the Rushmere St Andrew Neighbourhood Plan. We aim to reduce flood risk and protect and enhance the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest. Based on the environmental constraints within the area, we have no detailed comments to make in relation to flood risk for your Plan at this stage. However, we are providing comments in relation to Cemeteries.

## Cemeteries

We note that in section 6.11 of the plan, it refers to the local cemetery and a new extension to it – *“The current consecrated ground and the new extension have been planned with great care given to the importance of wildlife within a tranquil setting”*. It is not clear from this sentence whether it is a proposed new extension or one that already has permission/been built out. We do not appear to have been consulted on this cemetery extension at planning, and have not been provided with any information regarding the suitability of the site for burial or estimated numbers of burials per year etc. Although this is an extension to an existing cemetery, which has not caused any known pollution, this is not in itself adequate evidence to rule out the extension causing pollution.

For cemetery extensions we require a basic Tier 1, risk screening assessment. Details can be found online at:

<https://www.gov.uk/guidance/cemeteries-and-burials-groundwater-risk-assessments>

<https://www.gov.uk/guidance/cemeteries-and-burials-prevent-groundwater-pollution>

The Tier 1 assessment is primarily a desk study and should include amongst other things, published information regarding the geology and hydrogeology (groundwater levels across the site including seasonality). An assessment of the hazard(s) should be made, potential pathways and receptors should be identified and reviewed, and a qualitative assessment undertaken of the significance of the risks posed, for example, high, intermediate or low.

Generally the Environment Agency require the following basic controls:

- 250m minimum distance from potable groundwater supply source;
- 30m minimum distance from watercourse or spring;
- 10m minimum distance from field drains;

- no burials into standing water, with a minimum of 1m unsaturated ground below the base of the coffin (including seasonal fluctuation).

Without this basic information we automatically object to any application.

We realise that this is a small extension to a rural cemetery and we will be happy to assist the local church council in the production of the short report which should not be too onerous. Please contact Jackie James - Technical Specialist in our Groundwater & Contaminated Land team.

### Further Guidance

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: <https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/>.

The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites, and sustainable drainage measures can complement other objectives such as enhancing green spaces.

We trust this advice is useful

## Ministry of Defence

It is understood that East Suffolk Council are undertaking a Consultation regarding the submission of the Rushmere St Andrew Neighbourhood Plan under Regulation 16. The policies and proposals contained in the plan will be used by East Suffolk Council in the determination of planning application within the Rushmere St Andrew Neighbourhood Area

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

**Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.**

Having reviewed the supporting documentation in respect of Rushmere St Andrew Neighbourhood Plan there is one area of interest for the MOD.

The specific interest the MOD have in the plan area is a new technical asset known as the East 2 WAM Network which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Rushmere St Andrew Neighbourhood Plan area of interest.

The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern. Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

For your convenience, a copy of the safeguarding plan passed to DLUHC for formal issue has been attached to this email.

In summary, the MOD have no concerns or suggested amendments to the current draft of the Rushmere St Andrew Neighbourhood Plan that forms the subject of the current consultation.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

[East 2 WAM Network Plan](#)