



Ms Jan Mooney
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Our ref: AE/2018/122612/01-L01
Your ref: *
Date: 19 March 2018

Dear MS Mooney

WIVENHOE NEIGHBOURHOOD PLAN

Thank you for your letter dated 12 January 2018 relating to the Thaxted Neighbourhood Plan. We have assessed the draft Neighbourhood plan as submitted and the below letter contains our response and information in relation to environmental issues that should be considered during the development of the Neighbourhood plan.

Our principal aims are to protect and improve the environment, and to promote sustainable development, we:

- Act to reduce climate change and its consequences
- Protect and improve water, land and air
- Work with people and communities to create better places
- Work with businesses and other organisations to use resources wisely

You may find the following two documents useful. They explain our role in in the planning process in more detail and describe how we work with others; they provide:

- An overview of our role in development and when you should contact us.
- Initial advice on how to manage the environmental impact and opportunities of development.
- Signposting to further information which will help you with development.
- Links to the consents and permits you or developers may need from us.

Building a better environment: Our role in development and how we can help:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf

Environmental Quality in Spatial Planning <http://www.english->

heritage.org.uk/publications/environmental-quality-in-spatial-planning-supplementary-files/

We have reviewed the final version of the Wivenhoe Neighbourhood plan and have the following comments to offer.

Ground Contamination

Operators of cemeteries should take appropriate measures to manage their sites to ensure they do not cause an unacceptable risk to groundwater quality. These measures are set out in our comments below. The Local Planning Authority should consider whether they wish to secure specific measures through appropriate planning conditions.

The development of new cemeteries in high vulnerability areas should be avoided, except where the thickness and nature of the unsaturated zone, or the impermeable formations beneath the site, protect groundwater; or where the long-term risk is mitigated by appropriate engineering methods.

We recommend that reference should be made to cemetery section in the Environment Agency's Groundwater Protection: Principles and Practice and information on the Natural Death Centre website.

You may need to produce a hydrogeological risk assessment to show that there are minimal risks to the environment either at time of burial, or in the future. Reference should be made to our document "Assessing the Groundwater Pollution Potential of Cemetery Developments". Relevant best practice guidance must be followed and the design should be appropriate for the local circumstances, and should be based on site investigation.

In principle any new cemetery or the extension of any existing cemetery must:

- be at least 250 metres from a well, borehole or spring used to supply water that is used for human consumption, or for use in dairy farms;
- be at least 30 metres from any other spring or watercourse and at least 10 metres from any field drain;
- have at least one metre of subsoil below the bottom of the burial pit, allowing a hole deep enough for at least one metre of soil to cover the remains
- have at least one metre of unsaturated zone (the depth to the water table) below the base of any grave. Allowance should also be made to any potential rise in the water table (at least one metre should be maintained)

Flood Risk

We agree with objective 10 which includes 'to minimise the potential impact of flooding.' As per our letter dated 30 April 2014, this can be done via the implementation of sequential testing and flood defences.

This should be incorporated in any future development proposal sites. This will 'steer development away to areas with the lowest probability of flooding' as per paragraph 101 of the NPPF.

Natural Capital

Studies have shown that natural capital assets such as green corridors and green amenity spaces are important in climate change adaptation, flood risk management, increasing biodiversity and for human health and well-being. An overarching strategic framework should be followed to ensure that existing amenities are retained and enhanced. We are pleased to see policy 17 looks to allocate 'Local Green Spaces' which will look to protect these areas from being developed on. Development management will guide the provision of green infrastructure which should be delivered in a collaborative approach between developers, councillors and the local community. SuDS are often part of building green infrastructure into design. For more information please visit <http://www.susdrain.org/delivering-suds/using-suds/background/sustainable-drainage.html>

Please note that the view expressed in this letter are a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.

Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.

We trust this advice is helpful.

Yours sincerely

A handwritten signature in black ink, appearing to be 'N. Kermath', with a long horizontal flourish extending to the right.

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Planning Advisor

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