

Babergh and Mid Suffolk Joint Local Plan

Statement of Common Ground

Between

Babergh and Mid Suffolk District Councils (B&MSDC)

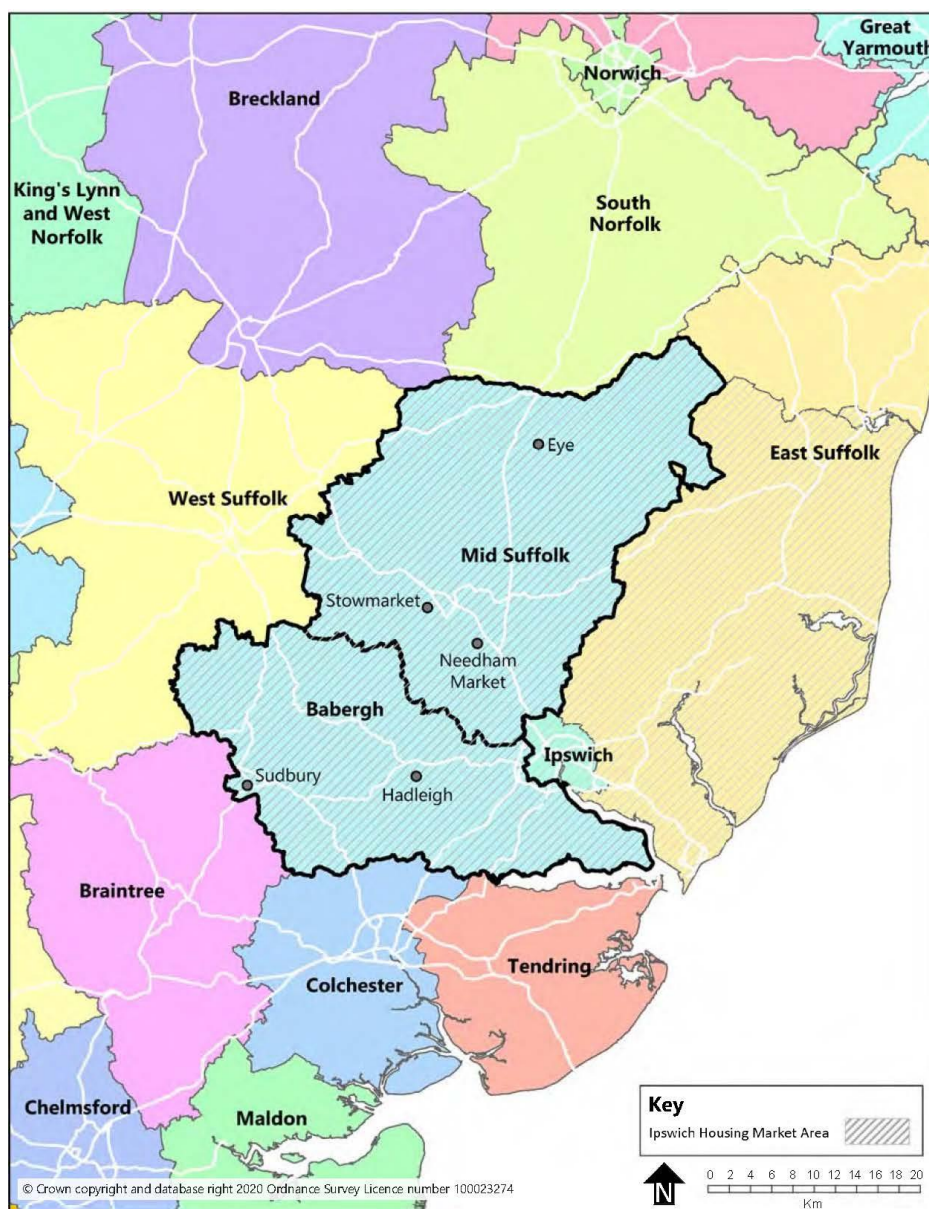
and

The Environment Agency (EA)

March 2021

1. Areas covered by the Statement of Common Ground

The Statement of Common Ground relates to the area covered by the local planning authorities of Babergh District Council and Mid Suffolk District Council.



2. Signatories to this Statement of Common Ground

The signatories to this Statement of Common Ground are:

- Babergh District Council;
- Mid Suffolk District Council; and
- The Environment Agency.

3. Purpose and Scope of Statement of Common Ground

Local planning authorities have a statutory duty to co-operate with specified bodies in relation to strategic planning matters. The Environment Agency is a prescribed body subject to the duty to co-operate as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and is required to be involved in the plan-making process.

Unsound representations were raised by the Environment Agency to some of the site allocations included in the Babergh and Mid Suffolk Joint Local Plan Pre-Submission (Reg 19) Document (November 2020).

The Environment Agency have worked with Babergh and Mid Suffolk District Councils in reviewing a two stage Strategic Flood Risk Assessment (SFRA) to support the Regulation 19 Pre-Submission Joint Local Plan consultation. The Environment Agency have reviewed the modelling supporting the SFRA and has identified a number of amber (minor) and red (major) issues. The Environment Agency therefore initially found some allocations in the Joint Local Plan unsound. The Environment Agency revised their River Gipping model at the end of 2020. This was not available to inform the production of the SFRA. The SFRA was produced through updating the previous River Gipping model to a 1D-2D model as discussed and agreed with the Environment Agency at the time.

Outstanding matters

Sites where new River Gipping modelling is available

Following the commissioning and submission of the SFRA, the Environment Agency revised their Gipping Model at the end of 2020. When comparing the SFRA outputs to those of the new Gipping modelling, there were 2 sites which showed a slight increase in flood extent with the Gipping modelling, and therefore unsound representations were raised by the Environment Agency:

1. LA044 – Stowmarket
2. LA116 – Land east of Loraine Way, Sproughton

Whilst it would have been preferable to the Environment Agency if the outstanding issues raised in relation to the SFRA modelling could have been addressed prior to submission, all parties agree that for the purposes of an SFRA, the modelling is sufficient and can be used with the appropriate caveats. The issues raised regarding the flood modelling are of more significance at the application stage, when designing finished floor levels and considering the siting of buildings. All parties agree that a site specific FRA will need to be completed for each site, and the model updated with the changes requested. If the modelling is not updated, this should be justified with evidence.

Sites where new modelling is not available

Site LA081 - Land north of Laxfield Road, Stradbroke

The SFRA has also identified this site is potentially at flood risk. The Environment Agency do not have Flood Risk modelling in the area of this site allocation and as such the SFRA modelling provides the only representation of fluvial flood risk. The Environment Agency are encouraged that the SFRA recommends that development is limited to the areas of the site located outside of Flood Zone 2 or 3.



The SFRA submitted in support of this allocation has been reviewed by the Environment Agency as part of the Joint Local Plan consultation. The hydraulic flood risk modelling has been reviewed by the Environment Agency which was found to have outstanding actions following the Environment Agency's review. However, the Environment Agency have looked into the outstanding issues for this allocation further to provide a more in depth insight regarding the impact of the modelling issues to Local plan delivery. The Environment Agency can confirm that the modelling is fit for the purpose of the SFRA and associated site allocation. Whilst the model does have outstanding actions/comments from the Environment Agency, for a high-level study such as this SFRA, it is accepted that the model is fit for purpose. The issues raised must be addressed at the planning application stage.

There is a proposal on this site for 28 dwellings (outline planning application reference DC/19/01343) which has a resolution to grant planning permission, subject to a Section 106 agreement. The Environment Agency did not comment on the application at the time as the best available information did not identify the site being at flood risk. The SFRA was subsequently commissioned and now provides more up to date modelling than the Flood Map for Planning. This application is sequentially sited according to the submitted plans. Any further applications on this site would require a site specific FRA, and the required model changes made, or reasons for not updating the model justified with evidence.

4. Process for reviewing the Statement of Common Ground

This Statement of Common Ground supersedes the interim one dated October 2020 and all parties will continue to work collaboratively as matters are reviewed during the Examination.

5. Signatories

Signed on behalf of Babergh District Council  Name: Tom Barker Position: Assistant Director Sustainable Communities	Date: 26/3/21
Signed on behalf of Mid Suffolk District Council  Name: Tom Barker Position: Assistant Director Sustainable Communities	Date: 26/3/21

Signed on behalf of the Environment Agency

Date: 26/03/2021

A handwritten signature in blue ink, appearing to read 'Jo Firth', is written over a faint, light blue circular stamp.

Name: Jo Firth

Position: Sustainable Places Team Leader