

# *Single Issue Review (SIR) of Core Strategy Policy CS7 - Preferred Option - Supplementary Documents*

## *Public Participation Report*

draft Infrastructure Delivery Plan April 2016

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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### *draft Infrastructure Delivery Plan April 2016*

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<p>24480 - Newmarket Horsemen's Group (NHG) [11392]</p>	<p>Comment</p>	<p>The draft IDP should be updated to reflect the outcome of the work that the NHG has identified as being required in relation to water quantity. The implications of this work will need to be factored into the IDP, which will inform the plan-making process.</p> <p>The draft IDP evidence base is largely out of date. The NHG consider that the AECOM 2016 study should address the issues that are set out below:</p> <p>The IECA (2009) document: Qualitative analysis rather than quantitative analysis of capacity issues was used. road network congestion, key infrastructure pressure. Medium to high levels of growth may be prevented without investment. More horse vehicle conflict arising from cumulative development. reference to limited evidence.</p>	<p>The IDP has been developed alongside the local plan documents. Evidence gathered at each stage of the process informs policies. A final IDP will follow examination and adoption of the plan. The final Water Cycle Study 2016 (WCS) follows the Stage 3 WCS published earlier in 2016. Consultation has been undertaken with Anglian Water (AW) and the Environment Agency (EA) as well as other relevant parties in order to provide an indication of the most up to date requirements for the water cycle and infrastructure impacts. These requirements have been reviewed on a site by site basis in the final WCS for all the locations identified in the SALP detailing any issues and constraints for each. This is part of the evidence base for the plan. Following the AECOM Technical Note (May 2016) a further study was commissioned to assess the cumulative impact of growth proposals across the whole district (and taking into account growth in East Cambridgeshire). This is a robust study that uses modelling and traffic surveys carried out at junctions agreed with SCC.</p>	<p>no action required</p>
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24287 - Bennett Homes [6665]	Comment	<p>The draft Infrastructure Delivery Plan states that it is possible to extend eastwards, accommodating between 640 - 1,120 homes, without impacting the SSSI. Therefore, the allocation is within the capacity of the area.</p> <p>The site is greenfield land but development would not threaten any flora or fauna on site . Bennett have commissioned Phase 1 and Phase 2 Habitat Survey reports and a separate Bird Breeding Survey, and the authors of these reports confirmed there are no insurmountable constraints that would prevent development. The flora on the northern and southern sections of site are common and widespread .</p> <p>Further, if the school, presently allocated at L2(b) fails to come forward, it is considered that site L/28b could accommodate that a school.</p> <p>Preliminary layout plans show a 1.35 ha school site capable of accommodating 315 pupils and a low density development of 98 dwellings which preserves the 'woodland' nature of the site.</p>	<p>Site L/28 has been omitted from the plan as it has a number of constraints:</p> <ul style="list-style-type: none"> <li>* Group tree preservation order</li> <li>* The site is 2.5km from Breckland Farm SSSI the nearest component of Breckland SPA and 1.8km from RAF Lakenheath SAC;</li> <li>* Development of the site would advance the line of development toward the SPA;</li> <li>* Additional issues relating to the woodland land use and corresponding ecological and landscape value of the north of the site.</li> </ul>	no action required
24481 - Newmarket Horsemen's Group (NHG) [11392]	Comment	<p>An update date evidence base is required. An up to date evidence base would require the following:</p> <p>Examine baseline traffic conditions. Examine baseline security conditions at all Horse Crossings within Newmarket. Review highway signing throughout Newmarket. Identify modelling techniques to best quantify impacts. Undertake traffic modelling for 'do nothing' and 2 SIR options. Quantify the impact of the two options. Consider measures to mitigate the impacts. Consider a lower number of homes if adequate mitigation cannot be achieved. Evaluate existing bus and rail service availability and consider improvements. examine opportunities to shift from car mode to walking and cycling. Review existing routes and crossings and cycle parking location. Consider potential new and improved cycle and pedestrian infrastructure.</p>	<p>Following the AECOM Technical Note (May 2016) a further study was commissioned to assess the cumulative impact of growth proposals across the whole district (and taking into account growth in East Cambridgeshire). Impacts/ issues and mitigation have been identified (including non-car modes and traffic management measures).</p>	no action required

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24203 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Comment	<p>Draft Infrastructure Delivery Plan</p> <p>We welcome the approach set out within the Infrastructure Delivery Plan, which covers all the areas of infrastructure we would expect in sufficient detail, sets out specific aims per settlement and stresses the need for infrastructure to be in place prior to development. We anticipate that the settlement hierarchy, which places the greatest number of houses in larger settlements, will help ensure that there is adequate provision of infrastructure.</p> <p>Policy CS13</p> <p>We welcome this policy, which recognises that there must be sufficient capacity in the existing infrastructure to support new development and also mentions biodiversity and wellbeing. We agree with the approach set out in the Greenspace strategy (see comments in the next section) and are pleased that the open space, sport and recreation provision will be applied in accordance with this document.</p> <p>5.1 - Note that natural areas, including locally and nationally designated sites, can also be included as part of the green infrastructure provision, as can ponds, hedgerows, wildlife corridors and other areas of habitat. Cemeteries may also be considered in this category.</p> <p>Table 2</p> <p>Note that we are in early discussions with your authority to put measures in place to protect locally and nationally designated sites, the options being extensions of sites to accommodate a higher level of visitors, the provision of Suitable Accessible Natural Greenspace (SANG) or the provision of a warden to oversee sites. These approaches are likely to rely on developer contributions, much in the same way as the requirement to provide alternative natural greenspace to Mildenhall Woods and measures to protect Maidscross Hill SSSI/NNR in Lakenheath. We fully agree with this approach and would also suggest that wording should be added regarding developer contributions to provide alternative greenspace or a warden at Red Lodge SSSI (please see our comments below on all these sites for more information).</p>	<p>The measures for protection of existing designated sites including Breckland SPA, Maidscross Hill SSSI and LNR and Red Lodge Heath SSSI are considered in the Accessible natural greenspace study which forms part of the evidence for the SIR and SALP. The approach to securing any measures set out is on a site by site basis, with each site contributing to either onsite or offsite measures, proportionate to the type, scale, and location of development such that these measures contribute to the strategy set out in the Accessible natural greenspace study. The addition of a warden at Red Lodge SSSI will be included in the Accessible natural greenspace study as one of the measures available to developers. The policy wording in the SALP sets out the requirement for these measures to be included as part of the development proposals.</p>	<p>Amend policySA4(a) to guide the size of the suitable alternative natural greenspace (SANG) requiring it to be of at least 10ha in size</p>

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24386 - Mrs Anita de Lotbiniere [6677]	Comment	<p>TRANSPORT</p> <p>There has been argued a need for Brandon to have a relief road to relieve congestion in Brandon and that this would be partly paid for by building houses in particular on the western edge of Brandon. I note that the Transport document has identified little change on traffic flow in Brandon over the two periods, but anecdotally, I suggest that it seems to have reduced overall. The dualling of the A11 from 5-ways roundabout to Thetford has taken a significant volume of traffic from the A1065.</p> <p>Traffic which proceeds on the A1065 to Brandon and beyond has been hindered by additional traffic lights on the A1065.</p> <p>The real constraint for free flowing traffic is the level crossing in Brandon and this would be most improved by building a bridge in the town.</p> <p>The relief road proposed is not of an adequate design, being single carriage way with several roundabouts and would be mostly used as an access road for any new housing - thus increasing the volume</p>	noted	no action required
24477 - Newmarket Horsemen's Group (NHG) [11392]	Comment	<p>The AECOM Transport Study Update is cited as evidence and yet was prepared after the publication of the draft IDP. This is the wrong order of events and therefore the conclusions are questionable.</p>	<p>Following the AECOM Technical Note (May 2016) a further study was commissioned to assess the cumulative impact of growth proposals across the whole district (and taking into account growth in East Cambridgeshire).</p> <p>This is a robust study that uses modelling and traffic surveys carried out at junctions agreed with SCC.</p>	no action required

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24204 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Comment	<p>Draft Infrastructure Delivery Plan</p> <p>We welcome the approach set out within the Infrastructure Delivery Plan, which covers all the areas of infrastructure we would expect in sufficient detail, sets out specific aims per settlement and stresses the need for infrastructure to be in place prior to development. We anticipate that the settlement hierarchy, which places the greatest number of houses in larger settlements, will help ensure that there is adequate provision of infrastructure.</p> <p>Policy CS13</p> <p>We welcome this policy, which recognises that there must be sufficient capacity in the existing infrastructure to support new development and also mentions biodiversity and wellbeing. We agree with the approach set out in the Greenspace strategy (see comments in the next section) and are pleased that the open space, sport and recreation provision will be applied in accordance with this document.</p> <p>5.1 - Note that natural areas, including locally and nationally designated sites, can also be included as part of the green infrastructure provision, as can ponds, hedgerows, wildlife corridors and other areas of habitat. Cemeteries may also be considered in this category.</p> <p>Table 2</p> <p>Note that we are in early discussions with your authority to put measures in place to protect locally and nationally designated sites, the options being extensions of sites to accommodate a higher level of visitors, the provision of Suitable Accessible Natural Greenspace (SANG) or the provision of a warden to oversee sites. These approaches are likely to rely on developer contributions, much in the same way as the requirement to provide alternative natural greenspace to Mildenhall Woods and measures to protect Maidscross Hill SSSI/NNR in Lakenheath. We fully agree with this approach and would also suggest that wording should be added regarding developer contributions to provide alternative greenspace or a warden at Red Lodge SSSI (please see our comments below on all these sites for more information).</p>	<p>The measures for protection of existing designated sites including Breckland SPA, Maidscross Hill SSSI and LNR and Red Lodge Heath SSSI are considered in the Accessible natural greenspace study which forms part of the evidence for the SIR and SALP. The approach to securing any measures set out is on a site by site basis, with each site contributing to either onsite or offsite measures, proportionate to the type, scale, and location of development such that these measures contribute to the strategy set out in the Accessible natural greenspace study. The addition of a warden at Red Lodge SSSI will be included in the Accessible natural greenspace study as one of the measures available to developers. The policy wording in the SALP sets out the requirement for these measures to be included as part of the development proposals.</p> <p>An amendment to the Accessible natural greenspace study will set out a consistent approach based on a distance of 7.5km.</p> <p>Consideration has been give to where a SANG of approximately 10ha would most appropriately be located such that it could be effective and deliverable. West of Mildenhall is a strategic growth location where there is currently no accessible greenspace, excepting PRoW available to meet the need of the new community. The existing green infrastructure such as the River lark corridor could be the focus for this SANG. Additional wording will be added to SA4(a) to guide the size of the SANG in this location which could provide some of these facilities. The accessible natural greenspace study will also be amended to be consistent with the policy and give details on the type of facilities that should be considered.</p> <p>Consideration has been given to whether Maidscross Hill SSSI/LNR and Red Lodge Heath SSSI and Aspal Close can be extended, however there are currently no options that would facilitate this. The Accessible natural greenspace study includes numerous opportunities for the enhancement of PRoW close to development sites and in the vicinity of these sites that could be</p>	Amend policySA4(a) to guide the size of the suitable alternative natural greenspace (SANG)requiring it to be of at least 10ha in size

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			delivered as part of development proposals.  The Council has updated the Accessible natural greenspace study evidence document and included a warden service to the suite of strategic measures recommended, that can be implemented to mitigate for increasing levels of recreation associated with the increase in housing. The Council will continue to work with Natural England to implement measures proportionate to the type, scale, and location of development in the plan. The policy wording in the SALP sets out the requirement for these measures to be included as part of the development proposals.	
24475 - Newmarket Horsemen's Group (NHG) [11392]	Object	4.2 As set out above the NHG has significant concerns regarding the quality of the transport evidence that underpins the Council's preferred options. These concerns are not overcome by the content of the draft IDP or latest transport note.	Following the AECOM Technical Note (May 2016) a further study was commissioned to assess the cumulative impact of growth proposals across the whole district (and taking into account growth in East Cambridgeshire). This is a robust study that uses modelling and traffic surveys carried out at junctions agreed with SCC.	no action required
24447 - Newmarket Horsemen's Group (NHG) [11392]	Object	Concerns about the inadequacy of water quantity assessments. Concerns about transport information as it is considered out of date. Transport note should have informed draft IDP, not after the draft IDP was prepared.	The final Water Cycle Study 2016 (WCS) follows the Stage 3 WCS published earlier in 2016. Consultation has been undertaken with Anglian Water (AW) and the Environment Agency (EA) as well as other relevant parties in order to provide an indication of the most up to date requirements for the water cycle and infrastructure impacts. These requirements have been reviewed on a site by site basis in the final WCS for all the locations identified in the SALP detailing any issues and constraints for each. This is part of the evidence base for the plan. The AECOM Technical Note May 2016 (Traffic) provided updated evidence for the Preferred Options stage of the plan-making process. A further study was commissioned to assess the cumulative impact of growth proposals across the district.	no action required

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24478 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG has raised concerns about the adequacy of the WCS work its representations to the HRA.	The final Water Cycle Study 2016 (WCS) follows the Stage 3 WCS published earlier in 2016. Consultation has been undertaken with Anglian Water (AW) and the Environment Agency (EA) as well as other relevant parties in order to provide an indication of the most up to date requirements for the water cycle and infrastructure impacts. These requirements have been reviewed on a site by site basis in the final WCS for all the locations identified in the SALP detailing any issues and constraints for each. This is part of the evidence base for the plan.	no action required
24479 - Newmarket Horsemen's Group (NHG) [11392]	Object	Under 'Improvements Required' reference is made to further assessment of 'impact of additional traffic on horse movements and the horse movements on other highway movements'. However, the NHG consider that there is no recognition in the draft IDP of the fact that horses are present and have been for hundreds of years and any new traffic from new development should take full account of the presence of horses and their particular needs; and provide appropriate infrastructure in consultation with the HRA.	The IDP is produced to support site allocations detailed in the SALP. It is not necessary to repeat supporting text or policies requirements in the IDP.	no action required
24147 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	<p>Page 39 Lakenheath - Transport</p> <p>Roads will be unable to cope with the demands to be placed upon them if all the proposed sites are developed.</p> <p>Please refer to the attached Railton report attached. <i>Updated Cumulative Highways Assessment for Lakenheath by Aecom dated 6th June 2016 contains suggestions.</i></p>	Cumulative site assessment has been carried out for planning applications on the majority of the sites to be allocated. Mitigation measures proposed adequate to accommodate volume of growth proposed.	no action required

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24469 - Newmarket Horsemen's Group (NHG) [11392]	Object	<p>3.3 NHG previously objected to Options 1, 2 and 4 in the August 2015 SIR but supported Option 3 low growth for Newmarket which comprised 300-330 residential units. The latest Option 1 refers to lower growth in Newmarket but involves double the previous low growth number i.e. an additional 680 homes (a medium growth scenario in 2015). The NHG considers this represents significant residential development and that it would have a significant detrimental impact on the Horse Racing Industry (HRI). The NHG also object to the latest Option 2 for the same reason.</p> <p>The IDP does not contain sufficient evidence to overcome the concerns that NHG has identified.</p>	The IDP has been developed alongside the local plan documents. Evidence gathered at each stage of the process informs policies. A final IDP will follow examination and adoption of the plan.	no action required
24451 - Newmarket Horsemen's Group (NHG) [11392]	Object	<p>The NHG's transport consultant has reviewed the latest note and has the following concerns:</p> <p>Non-car modes of transport and their traffic flows have not been considered. No attempt has been made to mitigate the issues identified by the document. Traffic flows at junction 37 of the A14, also increases at the Clock tower roundabout, AECOM say this should be considered further. Further concerns about increase to traffic along the Fordham Road (A142) corridor. SCC also share concern about A142 corridor but the report makes little attempt to address the issue. AECOM 2016 Technical note only updates trip rates/modal split/distribution and data from 2011 census and comparisons from 2009. NHG does not consider this sufficient.</p>	Following the AECOM Technical Note (May 2016) a further study was commissioned to assess the cumulative impact of growth proposals across the whole district (and taking into account growth in East Cambridgeshire). Impacts/issues and mitigation have been identified (including non-car modes and traffic management measures). The council will work with Suffolk County Council, Highways England and developers to ensure appropriate mitigation is provided.	no action required



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24148 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	<p>Updated Cumulative Highways Assessment for Lakenheath by Aecom dated 6th June 2016.</p> <p>We cannot see how even with the scenario (phase 1 with 4 developments) of 663 houses plus, the school, retail development (not mentioned yet again); that the impact on the B1112 / A1065 priority cross-roads is still "Not considered to be severe impact" nor "Approaching capacity, mitigation advised";.... as in table 1.2.</p> <p>Please refer to the attached Railton report attached.</p> <p><i>Updated Cumulative Highways Assessment for Lakenheath by Aecom dated 6th June 2016 contains suggestions.</i></p>	Cumulative site assessment has been carried out for planning applications on the majority of the sites to be allocated. Mitigation measures proposed adequate to accommodate volume of growth proposed.	no action required
24593 - Worlington Parish Council (Councillor Rupert Osborn) [12690]	Object	Concerns re infrastructure, roads, impact on Mildenhall and villages, traffic, quality of life,	Cumulative impact of growth proposals indicate areas where mitigation and other traffic measures will be necessary. New roads are not necessary for the amount of growth proposed in this plan period.	no action required
24454 - Newmarket Horsemen's Group (NHG) [11392]	Object	<p>Further comments from NHG transport consultant.</p> <p>No detailed modelling has been undertaken - AECOM says detailed analysis is required to understand the impacts. They refer to GS1 680 additional houses; and GS3 1080 additional house. Trip generation methodology has no exact reference to source and no sensitivity to if Newmarket might have changes to non-car infrastructure. In table 15 they compare 2016 with 2009 which is inappropriate , should be based on the impact of the two scenarios. In GS2 they state that there will be an increase in traffic but in GS1 it will reduce compared to 2009, when clearly there will be an increase with GS1 too.</p>	<p>Following the AECOM Technical Note (May 2016) a further study was commissioned to assess the cumulative impact of growth proposals across the whole district (and taking into account growth in East Cambridgeshire).</p> <p>This is a robust study that uses modelling and traffic surveys carried out at junctions agreed with SCC.</p>	no action required

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24461 - Newmarket Horsemen's Group (NHG) [11392]	Object	<p>Further comments from NHG transport consultant.</p> <p>Table 16 is a comparison with 2009 which again is inappropriate. Paragraph 8.5 refers to increases at the clock tower roundabout in all scenarios except GS1, but this is based on 2009 so is considered flawed. Table 17 has reference to infrastructure requirements that refer to 2009. Also no evidence of assessment. At paragraph 9.5 there is reference to the Hatchfield Farm proposals to improve the Rayes Lane junction. Evidence base for housing levels is out of date. There is no reference to, or consideration of, the needs of horses and HRI in the report.</p>	<p>Following the AECOM Technical Note (May 2016) a further study was commissioned to assess the cumulative impact of growth proposals across the whole district (and taking into account growth in East Cambridgeshire).</p> <p>This is a robust study that uses modelling and traffic surveys carried out at junctions agreed with SCC. The council will work with Suffolk County Council, Highways England and developers to ensure appropriate mitigation is provided.</p>	no action required
24464 - Newmarket Horsemen's Group (NHG) [11392]	Object	<p>3.1 The council states "...the IDP has been able to identify that there are no significant constraints to delivering the amount of growth set out in the SIR and the preferred locations set out in policies in the SALP." However, as set out above the evidence transport base is considered to be out of date so it is not possible to draw the conclusion 'no significant constraints'. The same is also true of the water quantity issues that the NHG has raised in relation to the HRA work.</p>	<p>Following the AECOM Technical Note (May 2016) a further study was commissioned to assess the cumulative impact of growth proposals across the whole district (and taking into account growth in East Cambridgeshire).</p> <p>This is a robust study that uses modelling and traffic surveys carried out at junctions agreed with SCC. The final Water Cycle Study 2016 (WCS) follows the Stage 3 WCS published earlier in 2016. Consultation has been undertaken with Anglian Water (AW) and the Environment Agency (EA) as well as other relevant parties in order to provide an indication of the most up to date requirements for the water cycle and infrastructure impacts. These requirements have been reviewed on a site by site basis in the final WCS for all the locations identified in the SALP detailing any issues and constraints for each. This is part of the evidence base for the plan.</p>	no action required

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24345 - Environment Agency (Elizabeth Mugova) [12393]	Support	<p>Wastewater capacity There is unlikely to be any significant impact on wastewater capacity associated with either option; provided Anglian Water have appropriate plans in place for upgrades. The updated Water Cycle Study (WCS) should provide the information/evidence to confirm capacity. Ultimately, Anglian Water are best placed to assess the impact on wastewater capacity.</p> <p>Flood Risk The flood zones within Forest Heath DC have been updated since the supporting Strategic Flood Risk Appraisal (SFRA) was produced. This could have implications for any allocations in close proximity to the previous floodplain. The Site Allocations plan should make reference to the latest guidance on climate change allowances in order to determine the future flood risk. Again, this could add some significant constraints to those towns and potentially allocated sites in and around the present day flood zone 2. We are happy to arrange a meeting to discuss the implications of both the updated flood models and the climate change allowance guidance.</p> <p>Water Framework Directive Assessment The Water Framework Directive (WFD) requires that new developments that have the potential to cause deterioration assess their impact on ecological quality (as set out in Article 4 of the WFD). The Anglian River Basin Management Plan (RBMP) requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. Therefore, where appropriate, developers should identify measures set out in the RBMP to restore the ecological value of the main rivers. New proposals must not prevent implementation measures in the RBMP to achieve "good". The following sites are close to the main river (River Lark, Cut Off Channel). Therefore, developers should assess the impacts on new development on these sites in terms of the WFD.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Site M1(a) - Land West of Mildenhall</li> <li><input type="checkbox"/> Site L1(a) - Matthews Nursery</li> <li><input type="checkbox"/> Site L1(b) - Land West of Eriswell Road</li> <li><input type="checkbox"/> Site L2(b) - Land at North Lakenheath</li> <li><input type="checkbox"/> Site L2(d) - Land North of Burrow Drive and Briscoe</li> </ul>	noted	no action required

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		<p>Way</p> <p>Developers should demonstrate compliance with the following WFD aims:</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Prevent deterioration of the chemical or ecological condition of surface waters and/or the chemical or quantitative condition of groundwater; and</li><li><input type="checkbox"/> Achieve overall good status on all waterbodies by 2021 or 2027 as appropriate for that waterbody.</li></ul>	<p>We support the Infrastructure Delivery Plan. The conclusions for water supply and wastewater are satisfactory. We note the reference to the updated Water Cycle Study dated March 2016, however, we are neither aware that the revised WCS has been drafted or issued.</p>	