Dear Mr Broadley

Ickford Neighbourhood Plan - Regulation 16 Consultation

Thank you for consulting the Environment Agency on the Draft Neighbourhood Plan for Ickford. We aim to reduce flood risk, while protecting and enhancing the water environment.

Flood Zone 2 & 3

Your plan sets out a settlement boundary within which some new housing will be supported. The neighbourhood plan area includes areas within Flood Zone 2 and 3.

In accordance with the National Planning Policy Framework (NPPF) para 155-159, we recommend the Sequential Test is undertaken when allocating sites or proposing new development to ensure development is directed to the areas of lowest flood risk.

The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA).

We would have concerns if development is allocated in flood zones without the Sequential Test being undertaken.

It is important that your Plan also considers whether the flood risk issues associated with any proposed development can be safely managed to ensure development can come forward. Without this understanding we are unsure how your Plan can demonstrate compliance with the NPPF.

We understand that you will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in this neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding.

Cont/d..
Policy F1

We note that policy F1 does not mention fluvial flood risk. Given that your Neighbourhood Plan includes areas of Flood Zones 2 and 3 we understand that this policy intends to deal with flooding from all sources.

Watercourses

There are a number of watercourses within or adjacent to the neighbourhood plan area and are currently failing to reach good ecological status in accordance with WFD. Developments within or adjacent to this watercourse should not cause further deterioration and should seek to improve the water quality based on the recommendations of the Thames River Basin Management Plan.

Further information

Together with Natural England, English Heritage and the Forestry Commission we have published joint advice on neighbourhood planning. This sets out sources of environmental information and ideas on incorporating the environment into neighbourhood plans. This is available at:


Final Comments

Once again, thank you for contacting us. Our comments are based on our available records and the information as submitted to us.

Please quote our reference number in any future correspondence.

If you have any queries please contact me.

Yours sincerely

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