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From: **PlanningSSD** <PlanningSSD@environment-agency.gov.uk>

Date: 1 August 2017 at 11:40

Subject: Plumpton Neighbourhood Plan Pre-Submission Working Draft - Comments from the Environment Agency

To: "Anita Emery, Clerk to Plumpton Parish Council"

<anita.emery@plumptonpc.co.uk>, "np@plumptonpc.co.uk" <np@plumptonpc.co.uk>

Dear Anita and NP Team,

Thank you for consulting the Environment Agency on the pre-submission version of your Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans. We aim to reduce flood risk, while protecting and enhancing the water environment. We have to focus our detailed engagement to those areas where the environmental risks are greatest.

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

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

Our detailed comments are as follows:

Policy 5 Page 34

As protected species are suspected to be present on some of the sites proposed for housing allocation, we suggest that Policy 5 is strengthened to ensure that development proposals should avoid significant harm to protected species and should seek to protect and enhance them.

Policy 7.1 Riddens Lane, Plumpton Green

We note that point 2. in this policy states that housing will be '**confined to the northernmost portion of the site to mitigate flood risk (Flood Zone 3) in the southern section**'.

Please note that for accuracy, the majority of the southern part of this site is located in Flood Zone 2 with a small proportion in Flood Zone 3.

We suggest that if the intention is to allocate the housing in the area of the site that is in Flood Zone 1 only, then the boundary for the housing allocation on Map E page 41 and on the Policies Map on page 64 are redrawn to reflect accurately where the housing will be allocated ie on the area of the site outside of Flood Zones 2 and 3.

We would have concerns if housing development is shown to be allocated on a map in Flood Zones 2 and 3 without the Sequential Test being undertaken (in accordance with the National Planning Policy Framework (NPPF) para 100-102). The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA). Your plan would also need to consider whether the flood risk issues associated with the site can be safely managed to ensure development can come forward.

If the housing allocation is shown on the maps in the Neighbourhood Plan to be within Flood Zone 1 only, then there is no need for evidence of the Sequential Test.

Policy 7.2 Wells Close, Plumpton Green

We are pleased to see that this allocation is located within Flood Zone 1.

Section 5.48 states that the site was previously a coal yard. There is therefore the potential for contamination. Appropriate site investigation and remediation proposals will be required – we suggest that this should be added to the policy wording of Policy 7.2.

In addition, there is a historic landfill site adjacent to the northern boundary of the site. We suggest that you contact the local authority for further advice.

Policy 7.3, The Glebe, Plumpton Green

We are pleased to see that this allocation is within Flood Zone 1.

Policy 7.4 Land Rear of Oakfield, Plumpton Green

We are pleased to see that this allocation is within Flood Zone 1.

Policy 7.5 Land At Plumpton Racecourse

Section 5.73 refers to the site incorporating a 'large bund of industrial hard waste'. Please note that there is therefore the potential for contamination. Appropriate site investigation will be required. Remediation proposals may be required depending on the outcome of the site investigation. We suggest that this should be added to the policy wording of Policy 7.5.

Map E Page 41

Please note that we have **not** assessed the other 'available sites' shown on Map E as it is our understanding from the document that these sites are not being proposed for housing allocations in the plan (as they are not shown on the Policies Map page 64).

Surface Water Issues

We note that you state that many of the sites to be allocated for housing have surface water issues. Please note that you should consult the Lead Local Flood Authority with regard surface water flooding issues.

Wastewater Treatment

We note that Policy 6 Page 36 refers to ensuring that there is adequate sewerage capacity. We would expect that the housing allocation sites should be connected to the **mains** foul sewer. We suggest that the wording in this policy and in Policies 7.1-7.5 should make this clear.

We hope you find these comments useful.

Best Wishes

Marguerite

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